

**APPENDIX II  
CORRESPONDENCE AND PUBLIC COMMENTS**

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September 6, 2001, letter sent from J. Bennett Graham (TVA) to the tribes listed below:

<b>Recipient</b>	<b>Tribe</b>
Mr. Walter Celestine	Alabama-Coushatta Tribe
Ms. Esther Holloway	Alabama-Quassarte Tribal Town
Dr. Richard Allen	Cherokee Nation of Oklahoma
Mr. James Bird	Eastern Band of Cherokee Indians
Mr. Tryg Jorgensen	Kialegee Tribal Town
Ms. Joyce Bear	Muscogee Nation of Oklahoma
Mr. Allen Harjo	Thlopthlocco Tribal Town
Mr. Archie Mouse	United Keetoowah Band

Page 1 of 2

September 6, 2001

Mr. Walter Celestine  
Alabama-Coushatta Tribe  
P.O. Box 3 Box 640  
Livingston, Texas 77351

RE: Tennessee Valley Authority (TVA) Proposed Aspen Grove-Bingham 161-kV  
Transmission Line, Williamson County

Dear Mr. Celestine:

TVA proposes to construct a new 161-kV transmission line to provide power to the proposed Bingham substation to be constructed by the Middle Tennessee Electric Membership Corporation (see enclosed figures). Presently, TVA has identified one route which would be 10 miles in length with 100 feet of right of way (ROW) and would run from the Aspen Grove substation to the Bingham substation. Alternative routings from some portions of the first route have also been proposed that are approximately 3.2 miles in length with 100 feet of ROW. Other alternative routings may be identified during the course of this undertaking. A cultural resources survey to identify historic properties will be conducted of the Area of Potential Effects (APE) for all proposed routings.

By this letter, TVA:

1. is initiating consultation with your office;
2. finds that the undertaking has the potential to affect historic properties should such properties be present in the Area of Potential Effect (APE);
3. defines the APE for archaeological resources as those lands on which the transmission line would be situated and for historic structures as those areas from which it would be visible; and
4. is inviting the Eastern Band of Cherokee Indians, Cherokee Nation of Oklahoma, United Keetoowah Band, Muscogee Nation of Oklahoma, Poarch Band of Creek Indians, the Alabama-Coushatta Tribe, the Alabama-Quassarte Tribal Town, Kialegee Tribal Town, and the Thlopthlocco Tribal Town to comment on this project.

September 6, 2001, letter sent from J. Bennett Graham (TVA) to the tribes listed below:

<b>Recipient</b>	<b>Tribe</b>
Mr. Walter Celestine	Alabama-Coushatta Tribe
Ms. Esther Holloway	Alabama-Quassarte Tribal Town
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Page 2 of 2

Mr. Walter Celestine  
Page 2  
September 6, 2001

Pursuant to 36 CFR § 800.2(c)(ii)(A), we are inviting any comments regarding the proposed undertaking and its effects on historic properties that may have traditional religious or cultural significance to the Alabama-Coushatta Tribe. Please respond within thirty days of receipt of this letter.

Should you have any questions or comments, please contact Richard Yarnell at 865/632-1584.

Sincerely,

J. Bennett Graham  
Senior Archaeologist

Enclosures

November 9, 2001, letter from J. Bennett Graham (TVA) to Ms. Joyce Bear, Muscogee (Creek) Nation of Oklahoma

November 9, 2001

Ms. Joyce Bear  
Muscogee (Creek) Nation of Oklahoma  
Post Office Box 580  
Okmulgee, Oklahoma 74447

RE: TVA, ASPEN GROVE-BINGHAM 161-KV TRANSMISSION LINE, FRANKLIN, WILLIAMSON COUNTY

Dear Ms. Bear:

Enclosed is the draft report Archaeological Survey of the Aspen Grove 161-kV Transmission Line in Williamson County, Tennessee. Previous investigations identified fourteen archaeological sites in the vicinity of the proposed project. Five of these sites were revisited during the Phase I survey. Six additional sites were also identified during the survey. Of these 11 sites identified within the project's APE, one (40WM271) is recommended as eligible for the National Register of Historic Places (NRHP) under Criterion D of 36 CFR 800. Measurements will be put into place to avoid 40WM271. If the site cannot be avoided, Phase II testing will be required. The surface survey and subsurface shovel testing of the remaining ten sites did not encounter significant intact deposits that would yield important archaeological information. These sites are recommended as ineligible for the NRHP.

Geomorphological assessment within the APE identified several areas with a moderate to high potential for buried deposits. Any proposed transmission line structure locations constructed within these areas will be investigated under a buried site testing survey, with a report of our findings and recommendations submitted to your office for review and comment.

TVA concurs with the findings and recommendations of the report's author. Therefore, pursuant to the requirements of Section 106 of the National Historic Preservation Act and its implementing regulations at 36 CFR Part 800, TVA's Cultural Resources is seeking your comments on these findings and recommendations. Please respond within thirty days of receipt of this report. If there are any questions or comments please contact Richard Yarnell at (865) 632-1584.

Sincerely,

J. Bennett Graham  
Senior Archaeologist

Enclosure

WRV:EEP

December 18, 2001, letter from J. Bennett Graham (TVA) to Mr. James Bird, Eastern Band of the Cherokee Nation

December 18, 2001

Mr. James Bird  
Tribal Historic Preservation Officer  
Eastern Band of the Cherokee Nation  
Post Office Box 455  
Cherokee, North Carolina 28719

RE: TVA, ASPEN GROVE-BINGHAM 161-KV TRANSMISSION LINE, FRANKLIN, WILLIAMSON COUNTY

Dear Mr. Bird:

Enclosed is the draft report Archaeological Survey of the Aspen Grove 161-kV Transmission Line in Williamson County, Tennessee. Previous investigations identified fourteen archaeological sites in the vicinity of the proposed project. Five of these sites were revisited during the Phase I survey. Six additional sites were also identified during the survey. Of these 11 sites identified within the project's APE, one (40WM271) is recommended as eligible for the National Register of Historic Places (NRHP) under Criterion D of 36 CFR 800. Measurements will be put into place to avoid 40WM271. If the site cannot be avoided, Phase II testing will be required. The surface survey and subsurface shovel testing of the remaining ten sites did not encounter significant intact deposits that would yield important archaeological information. These sites are recommended as ineligible for the NRHP.

Geomorphological assessment within the APE identified several areas with a moderate to high potential for buried deposits. Any proposed transmission line structure locations constructed within these areas will be investigated under a buried site testing survey, with a report of our findings and recommendations submitted to your office for review and comment.

TVA concurs with the findings and recommendations of the report's author. Therefore, pursuant to the requirements of Section 106 of the National Historic Preservation Act and its implementing regulations at 36 CFR Part 800, TVA's Cultural Resources is seeking your comments on these findings and recommendations. Please respond within thirty days of receipt of this report. If there are any questions or comments please contact Richard Yamell at (865) 632-1584.

Sincerely,

J. Bennett Graham  
Senior Archaeologist

Enclosure

WRY:EEP

July 9, 2003, letter from J. Bennett Graham (TVA) to the tribes listed below:

<b>Recipient</b>	<b>Tribe</b>
Mr. James Bird	Eastern Band of Cherokee Indians
Ms. Joyce Bear	Muscogee (Creek) Nation of Oklahoma

Page 1 of 2

July 9, 2003

Mr. James Bird  
 Tribal Historic Preservation Officer  
 Eastern Band of the Cherokee Indians  
 Post Office Box 455  
 810 Acquoni Road  
 Cherokee, North Carolina 28719

**Subject:** Newly Proposed Alternative for the Aspen Grove 161-kV Transmission Line, Williamson County

Dear Mr. Bird:

In response to public comment received during TVA's NEPA review of the proposed Aspen Grove transmission line, an adjustment to our preferred route has been proposed (see enclosed figure 1). This adjustment shortens the length of the line in order to serve a new substation location. The new substation would now be constructed by Middle Tennessee Electric Membership Corporation near Del Rio Pike instead of at the Bingham site. Where the alternative stops at Baugh Bend it would connect to the eastern portion of the proposed line that was previously surveyed and documented in "Archaeological Survey of the Aspen Grove 161-kV Transmission Line in Williamson County, Tennessee (Ezell 2001)." This report was sent to your office on December 18, 2001 (enclosed). In that letter, we determined that any transmission line structures positioned within areas with a potential for buried deposits (as identified in Ezell 2001) would be investigated under a buried site testing survey. TVA is currently preparing a Memorandum of Agreement for this undertaking which would include such provisions for buried site testing.

Additional survey work was recently conducted to review this new alternative routing for archaeological resources. Please find enclosed one copy of the draft report "Archaeological Survey of the Aspen Grove 161-kV Transmission Line (Alternate D) in Williamson County, Tennessee." TVA Cultural Resources staff has reviewed this report and agree with the findings and recommendations of the author that no archaeological sites are located within the APE of the new alternative.

July 9, 2003, letter from J. Bennett Graham (TVA) to the tribes listed below:

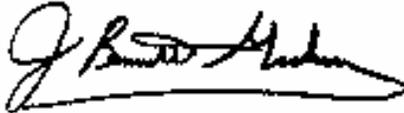
<b>Recipient</b>	<b>Tribe</b>
Mr. James Bird	Eastern Band of Cherokee Indians
Ms. Joyce Bear	Muscogee (Creek) Nation of Oklahoma

Page 2 of 2

Mr. James Bird  
July 9, 2003  
Page 2

Pursuant to 36 CFR 800, we are continuing our consultation for this undertaking and are seeking your comments on our finding that there are no eligible or listed archaeological sites within this new alternative. By this letter, we are also inviting the Eastern Band of the Cherokee Indians to be a concurring party to the Memorandum of Agreement. A draft copy of this agreement will be submitted to your office within 30 days. Should you have any questions or comments, please contact Richard Yamell at 865/632-1584 or [wryamell@tva.gov](mailto:wryamell@tva.gov).

Sincerely,



J. Bennett Graham  
Manager and Senior Archaeologist  
Cultural Resources

Enclosures

November 14, 2001, letter from Tennessee State Historic Preservation Officer



**TENNESSEE HISTORICAL COMMISSION**  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
294 LEBANON ROAD  
NASHVILLE, TN 37243-0442  
(615) 532-1550

November 14, 2001

Mr. J. Bennett Graham  
Tennessee Valley Authority  
Cultural Resources  
Post Office Box 1589  
Norris, Tennessee 37828-1589

RE: TVA, PHASE I ARCHAEOLOGICAL ASSESSMENT, ASPEN GROVE-BINGHAM 161-KV LINE,  
FRANKLIN, WILLIAMSON COUNTY.

Dear Mr. Graham:

At your request, our office has reviewed the above-referenced archaeological survey report in accordance with regulations codified at 36 CFR 800 (Federal Register, December 12, 2000, 77698-77739). Based on the information provided, we concur that the project area contains archaeological resources potentially eligible for listing in the National Register of Historic Places. Site 40WWM271 should be subjected to Phase II archaeological testing, or avoided by all ground-disturbing activities. In addition, the areas identified within the survey report as having a "moderate to high" potential for the presence of buried archaeological deposits should also either be avoided by all ground-disturbing activities or subjected to mechanical deep testing.

Upon receipt of the Phase II and deep testing reports or construction avoidance strategies, we will complete our review of this undertaking as expeditiously as possible. Please submit a minimum of two copies of each final report and complete Tennessee Site Survey Forms to this office in accordance with the Tennessee Historical Commission Review and Compliance Section Reporting Standards and Guidelines. Until such time as this office has rendered a final comment on this project, your Section 106 obligation under federal law has not been met. Please inform this office if this project is canceled or not funded by the federal agency. Questions and comments may be directed to Jennifer M. Bartlett (615) 741-1688, ext. 17.

Your cooperation is appreciated.

Sincerely,

A handwritten signature in cursive script, appearing to read "Herbert L. Harper".

Herbert L. Harper  
Executive Director and  
Deputy State Historic  
Preservation Officer

HLH/jmb

October 29, 2002, letter from Tennessee State Historic Preservation Officer



October 29, 2002

**TENNESSEE HISTORICAL COMMISSION**  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
2941 LEBANON ROAD  
NASHVILLE, TN 37243-0442  
(615) 532-1550

Mr. J. Bennett Graham  
Cultural Resources Program  
Post Office Box 1589  
Norris, Tennessee, 37828-1589

RE: TVA, ASPEN GROVE-BINGHAM TRANSMISSION, UNINCORPORATED, WILLIAMSON COUNTY

Dear Mr. Graham:

In response to your request, received on Monday, October 21, 2002, we have reviewed the documents you submitted regarding your proposed undertaking. Our review of and comment on your proposed undertaking are among the requirements of Section 106 of the National Historic Preservation Act. This Act requires federal agencies or applicant for federal assistance to consult with the appropriate State Historic Preservation Office before they carry out their proposed undertakings. The Advisory Council on Historic Preservation has codified procedures for carrying out Section 106 review in 36 CFR 800. You may wish to familiarize yourself with these procedures (Federal Register, December 12, 2000, pages 77698-77739) if you are unsure about the Section 106 process. You may also find additional information concerning the Section 106 process and the Tennessee SHPO's documentation requirements at [www.state.tn.us/environment/hist/sect106.htm](http://www.state.tn.us/environment/hist/sect106.htm).

Considering available information, we find, after applying the Criteria of Adverse Effect codified at 36 CFR Part 800, that the project as currently proposed will **ADVERSELY AFFECT PROPERTIES THAT ARE ELIGIBLE FOR LISTING IN THE NATIONAL REGISTER OF HISTORIC PLACES**. Therefore, this office has an objection to the implementation of this project. You should now, through TVA, inform the Advisory Council on Historic Preservation of this adverse effect determination and begin immediate consultation with our office. Please enclose a copy of this determination in your notification to the Council as delineated at 36 CFR Part 800. Until you have received a final comment on this project from this office and the Council, you have not completed the Section 106 review process. Please direct questions and comments to Joe Garrison (615) 532-1559. We appreciate your cooperation.

Sincerely,

Herbert L. Harper  
Executive Director and  
Deputy State Historic  
Preservation Officer

HLH/jyg

July 14, 2004, letter from Tennessee State Historic Preservation Officer



**TENNESSEE HISTORICAL COMMISSION**  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
2941 LEBANON ROAD  
NASHVILLE, TN 37243-0442  
(615) 532-1550

July 14, 2004

Mr. J. Bennett Graham  
Tennessee Valley Authority  
Post Office Box 1589  
Norris, Tennessee, 37828-1589

RE: TVA, ASPEN GROVE 161 KV TRANSMISSION, FRANKLIN, WILLIAMSON COUNTY

Dear Mr. Graham:

In response to your request, received on Tuesday, July 6, 2004, we have reviewed the documents you submitted regarding your proposed undertaking. Our review of and comment on your proposed undertaking are among the requirements of Section 106 of the National Historic Preservation Act.

Considering available information, we concur, after applying the Criteria of Adverse Effect codified at 36 CFR Part 800, that the project as currently proposed will **ADVERSELY AFFECT PROPERTIES THAT ARE ELIGIBLE FOR LISTING IN THE NATIONAL REGISTER OF HISTORIC PLACES**: namely, the Harpeth River Historic District. We further concur that your proposed mitigations appear to resolve project adverse effects to the historic district. Before rendering a final finding in this case, however, we will need to review the comments of the other consulting parties in this case concerning their determinations of National Register eligibility, project effect, and the manner your agency has suggested to resolve those project effects.

Upon receipt of this documentation from you, we will complete our review of this undertaking as quickly as possible. You should also ensure that you have informed the Advisory Council on Historic Preservation of this adverse effect determination. Until you have received a final comment on this project from this office, you have not completed the Section 106 review process. Please direct questions and comments to Joe Garrison (615) 532-1550-103. We appreciate your cooperation.

Sincerely,

A handwritten signature in cursive script that reads "Herbert L. Harper".

Herbert L. Harper  
Executive Director and  
Deputy State Historic  
Preservation Officer

HLH/jyg

**HARPETH RIVER WATERSHED ASSOCIATION**  
*"Working together to protect and restore to Harpeth River"*

July 18, 2001

Kate Jackson, Executive Vice-President  
River Systems, Operations, and Environment  
TVA

Terry Boston, Executive Vice-President  
Transmission and Power Supply  
TVA

Dear Ms. Jackson and Mr. Boston:

I have attached to this cover letter to the attached statement of our concerns regarding the ecological ramifications of the current route under consideration for the proposed Aspen Grove-Bingham 161-kV transmission line. This transmission line is an agenda item on today's TVA board meeting as Category C, Item F1, to seek approval to file condemnation and to acquire easement rights-of-way to survey the corridor.

Though I have spoken briefly to Hugh Barger and Fowler Tucker regarding our concerns when the route was first offered in April, we have submitted the attached statement with the route to them today. While the current route has been designed to address some of the important historic concerns that local groups, landowners, and the city of Franklin have expressed, the HRWA believes that the ecological ramifications of the current proposed route have not been adequately addressed. I have sent this to you prior to the board meeting to inform you that this recent route has clear ecological concerns that could be addressed by TVA internally before effort and money is spent to survey it. An Environmental Assessment along this proposed route will underscore some of the same issues that we have identified from our preliminary field work.

The current proposed 7 mile transmission line corridor includes: 3 crossings of the Harpeth River in 1.5 river miles, 5 crossings of West Harpeth in 2.5 miles, and 1 crossing of Spencer creek, for a total of 9 crossings. In addition, 2 miles of the route runs through the floodplain of the West Harpeth. Based on our recent field survey of the Harpeth River, we found that existing transmission line crossings on the Harpeth River are a significant source of siltation in the water from bank erosion and have eliminated or drastically altered vital streamside vegetation habitat. Thus, the Harpeth River Watershed Association is very concerned that the numerous crossings proposed over such short river segments will lead to further degradation to the already stressed systems of the West Harpeth and Harpeth River.

I have sent this statement and a similar letter to Jim Baker at MTEMC. We are hopeful that we can work with TVA and MTEMC along with other local stakeholders to assess whether a route is actually possible along this corridor through northern Franklin that incorporates all the important ecological, historic, open space, recreational, and aesthetic issues in the area.

Sincerely,

Dorene Bolze  
Executive Director  
(615) 591-9095  
doriebolze@home.com

tvacoverletter

Page 2 of 2

P.O. BOX 1127 • FRANKLIN, TN • 37065  
EMAIL: HARPETHRIVERWA@HOME.COM

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07/18/2001

**H A R P E T H R I V E R W A T E R S H E D A S S O C I A T I O N**

**Proposed Aspen Grove-Bingham 161-kV Transmission Line in Williamson County**

**Statement of Concern**

**on**

**Ecological Degradation to West Harpeth and Harpeth River**

**July 18, 2001**

**Summary:** The current proposed 7 mile transmission line corridor includes: 3 crossings of the Harpeth River in 1.5 river miles, 5 crossings of West Harpeth in 2.5 miles, and 1 crossing of Spencer creek, for a total of 9 crossings. Existing transmission line crossings on the Harpeth River are a significant source of siltation in the water from bank erosion and have eliminated or drastically altered vital streamside vegetation habitat. The Harpeth River Watershed Association (HRWA) is very concerned that the numerous crossings over such short river segments and that the path of the route along the West Harpeth floodplain will lead to further degradation to the already stressed systems of the West Harpeth and Harpeth River. The HRWA believes that the ecological ramifications of the current proposed route have not been adequately addressed. We encourage TVA and MTEMC to work with the local stakeholders to assess whether a route is actually possible along this corridor through northern Franklin that incorporates all the important ecological, historic, open space, recreational, and aesthetic issues in the area.

**Background:**

Middle Tennessee Electric Membership Corporation (MTEMC) has proposed several options for upgrading distribution systems to service the western part of Franklin, TN, and neighboring areas in Williamson County based on current demand and assumptions on projected growth. In 1999, MTEMC proposed building a new substation in the western region of Franklin, TN (the Bingham substation) and linking it to the Aspen-Grove substation in Cool Springs with this proposed TVA high voltage transmission line. This proposal means that a new, 7-mile, transmission line requiring on average a 100-foot wide right-of-way would cut across the northern region of Franklin, TN along MacHatcher Parkway, across the Harpeth River, along the floodplain and across the West Harpeth, across gateway entrances into historic Franklin, and nearby or through numerous historic properties and archeological sites. In November 2000, the city of Franklin issued a resolution opposing the TVA high-voltage transmission line along this corridor through northern Franklin.

The Heritage Foundation, city officials, landowners, and others have expressed legitimate concerns regarding the aesthetic impact on historic resources, especially the portion of the route that TVA proposed along Highway 96W. As a result, the portion that was along Highway 96W is now proposed to run through the floodplain of the West Harpeth, crossing the river five times within 2.5 river miles. The proposed route also crosses the Harpeth River two times within 1.5 river miles along a stretch that is scenic and used recreationally. The ecological ramifications from increased erosion, increased sedimentation, and habitat alterations from canopy tree removal along the streambanks are a major concern with this proposed route.

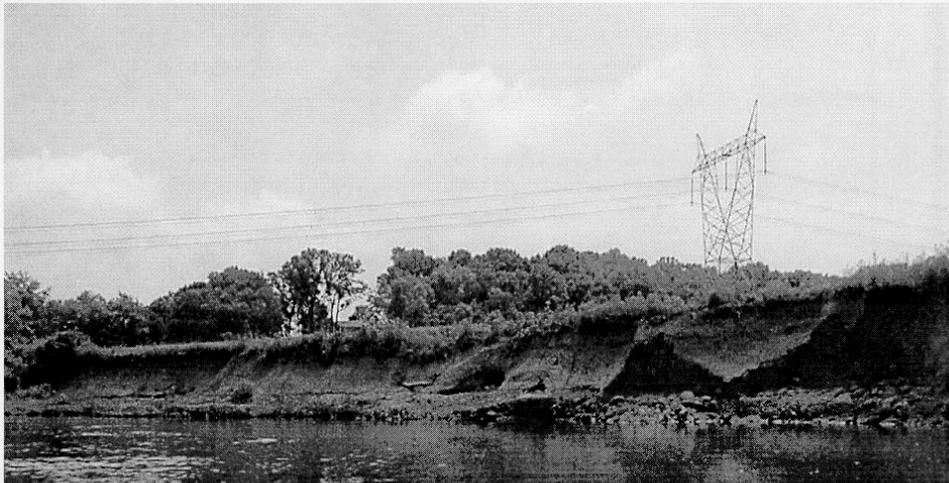


- 2 -

**Ecological Ramifications--Degradation to West Harpeth and Harpeth River High Risk**

The proposed route will affect 3 waterways with a total of nine crossings. Of most concern are the crossings close together on the Harpeth River, and the five crossings and corridor along the floodplain of the West Harpeth river. All three waterways are already stressed with siltation that is coming from stormwater runoff with expanding development in the area and from agricultural practices. Sedimentation covers up the streambed habitats, filling crevices used by invertebrates and insects that are food for fish, and covering fish nesting areas. Biologically, these stresses alter species diversity in the streams as sensitive species are eliminated and more tolerant species increase. Sediment can also be rich in fertilizer and other sources of nutrients that foster algal growth that can dramatically reduce oxygen in the water, especially during low flow conditions. This section of the Harpeth River is also heavily influenced by the effluent from the city of Franklin's sewage treatment plant and suffers from low oxygen levels because of algal growth.

The Harpeth River Watershed Association (HRWA) began a preliminary environmental assessment of the proposed transmission line corridor along the West Harpeth in June. The HRWA also just completed a visual survey of sedimentation problems and habitat quality along the entire length of the Harpeth River. Based on this work, we are very concerned with the number of river crossings. Current transmission line crossings across the Harpeth River were found in our survey to be the sites of the worst bank erosion areas along the river, as illustrated below in Figure 1. At such sites, huge chunks of the bank the size of automobiles were falling into the river. Exposed banks are a major source of sedimentation. It appears that transmission lines in this area are handled with drastic vegetation removal programs up to the water's edge, along with the heavy use of herbicides, both of which contribute silt and chemical pollutants to the water. Clearing the streamside vegetation also eliminates shade that protects the river from high water temperatures that contribute to water quality degradation.



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- 2 -

**Figure 1:** Transmission line crossing of Harpeth River just north of Old Hillsboro Road in May 2001. Exposed banks are eroding and are source of sediment in the Harpeth River. ©Mike Walton.

A transmission line corridor requires vegetation management to keep trees below the lowest point in the line across the width of the corridor, 100 feet for this proposed route. According to MTEMC, the height will be as low as 30 feet. This will require the removal of the canopy trees for any wooded habitat that the corridor crosses. Both the West Harpeth and Harpeth have mature canopy riparian corridors along the banks; thus, each crossing could entail clearing a 100-foot swath in this canopy. In addition, the proposed route would cut through a section of wooded wetland habitat that occurs in the West Harpeth floodplain and cut through numerous hedgerow habitats.

All streams and river segments proposed to be crossed by this transmission line have been identified as impaired by TDEC under section 305 of the federal Clean Water Act and are on the 303(d) List that is compiled by TDEC based on regular assessments. All streams and lakes on the 303(d) List are considered "water quality limited" and in need of additional pollution controls. Once a stream has been placed on the 303(d) List, it is considered a priority for water quality improvement efforts.

Both the 303(d) list and recent 305(b) report are available on the TDEC web site. However, the best way to visualize all the streams in the Harpeth River watershed on the 303(d) list is to look at the watershed map produced by the Cumberland River Compact and partially funded by the HRWA. These are available upon request.

The proposed transmission line route will add further sediment loading and entail loss of important riparian habitat to all these stressed river and stream segments that already have been identified by TDEC as priority areas for restoration. The HRWA has already begun working with landowners along this segment of the West Harpeth to identify opportunities to stabilize streambanks and encourage native habitats in the riparian zone and floodplain. Also, the HRWA has just received a grant from the TN Department of Agriculture's Nonpoint Source Program to survey all the 303(d) listed streams in the entire watershed in order identify priorities for reducing stresses and improve habitat integrity. This proposed transmission line route could significantly reduce these efforts and those of other groups to restore the West Harpeth and Harpeth River in and around Franklin.

- a) **West Harpeth**— The entire length of the West Harpeth and some of its tributaries are on the 303(d) List because of siltation problems from pasture grazing in the riparian zone, upland, and because of "livestock in streams," according to the latest TDEC report, *The Status of Water Quality in Tennessee Year 2000 305(b) Report*. Along the 2.5-mile segment of relevance to the proposed transmission line corridor, much of the streambank supports a riparian zone with mature tree canopy, though it is not wide. In one ¼ mile segment where the line is proposed to span a bend in the river and make two crossings, much of the mature tree canopy was lost two years ago during a straight-line storm. Removing the remaining canopy over the river for the crossings would expose much of the river in this section to direct sunlight. Degrading the water quality, especially by increasing algal growth and reduced oxygen levels, will affect the Harpeth River which receives the water from the West

- 3 -

Harpeth about 2 miles downstream. The water from the West Harpeth currently provides needed oxygen and dilution to the main Harpeth to ameliorate the stress from nutrient laden algal growth that can drive oxygen levels down low in the summer conditions.

- b) **Harpeth River**— The segment of the Harpeth River from its headwaters to the confluence with the West Harpeth is listed on the 303(d) List because of siltation, loss of riparian habitat and other habitat alterations. All these problems stem from development and stormwater runoff as well as from agricultural practices that were described above for the West Harpeth. In addition, the section of the Harpeth downstream of Spencer Creek where the effluent enters from the sewage treatment plant until the confluence with the West Harpeth is impaired because of stormwater runoff and nutrient enrichment and low oxygen levels in the water. The two new transmission line river crossings within 1.5 miles of each other will cut across a bend in the river just after it flows under Hillsboro Road. Based on the HRWA visual assessment survey, these line crossings will remove riparian habitat with mature tree canopy. This will increase sedimentation as these denuded banks are affected by high flows during storms, and remove important shade cover. This stretch of the river is used recreationally for canoeing. Transmission line crossings will add a further challenge to developing the Total Daily Maximum Load implementation plan required under the Clean Water Act for the Harpeth River to address all sources for nutrient enrichment and low dissolved oxygen. This TMDL is under development by the EPA.

**Recommendations:**

1. This proposed route for the transmission line does not appear to reflect much consideration for ecological issues involved in this corridor across the northern area of Franklin, TN. Before surveying this proposed route, we recommend that TVA's transmission and power supply division contact the environment division to review the proposed route. We believe that the number of crossings over such short river segments would be identified as a problem for water quality and stream habitat integrity without having to even go on site.
2. Before further work is done by TVA on this proposed route to survey and conduct environmental assessments, the HRWA is willing to work with TVA and MTEMC and all other stakeholders to assess whether there is a possible route across the northern area of Franklin that addresses all the issues comprehensively: protection of ecological integrity, historic resources, archeological resources, open space, recreational uses, and aesthetic values. The HRWA recognizes the challenge in siting transmission lines, especially in a developing area like Franklin, and is willing to work closely with all interested parties on whether a corridor exists across northern Franklin to balance all these values. However, concerns with this proposed corridor does not mean that the HRWA supports a particular route at this time or supports the current assertions that such a transmission line and proposed substation are the best approaches to addressing electrical load needs in the area.
3. Because of the many issues involved in this corridor across northern Franklin, it appears that TVA and MTEMC need to evaluate other options besides the proposed substation and high voltage transmission line. The HRWA is willing to work with TVA, MTEMC, and

- 4 -

energy experts on ways to integrate programs to reduce peak load demand, plan for power supply, and upgrade distribution systems that could also be applied to other areas in the 870 square-mile Harpeth River watershed.

4. If TVA feels compelled to continue to the next step in the process with this proposed route, the cumulative effects of all these crossings over such short river segments must be assessed in the Environmental Assessment that is performed for any proposed route, especially since all three waterways that the transmission line is currently proposed to cross are interconnected.

**Contact:**

Dorene Bolze  
Executive Director  
Harpeth River Watershed Association  
(615) 591-9095

**Error! Bookmark not defined.**

*The mission of the Harpeth River Watershed Association mission is to protect and restore the Harpeth River. Only two years old, the HRWA is committed to re-building and maintaining the ecological integrity of the watershed amidst the various human uses of the landscape. We are doing this by forging partnerships in order to provide information, training, and programs that enable homeowners, landowners, farmers, families, businesses, researchers, government agencies, and elected officials to directly enhance areas of the Harpeth River watershed.*



February 6, 2002, letter from Harpeth River Watershed Association, Page 1 of 3

# HARPETH RIVER WATERSHED ASSOCIATION RECEIVED

2002 FEB -6 P 3:37

February 6, 2002

GLENN L MCCULLOUGH, JR  
CHAIRMAN

Board of Directors  
Tennessee Valley Authority  
400 West Summit Hill Drive  
Knoxville, TN 37902

Re: Proposed TVA 161-kV Transmission Line in Franklin, TN/Follow-up request for information

Dear Chairman McCullough and Directors Harris and Baxter:

As you know, at the September 2001 TVA board meeting, I presented to the Board of Directors a set of requests for information in order for Synapse Energy Economics to conduct their independent assessment of engineering and distribution system options and energy efficiency options related to the proposed TVA transmission line and proposed substation by MTEMC in the Franklin, TN area. Synapse Energy Economics is conducting this assessment for the Harpeth River Watershed Association and Southern Alliance for Clean Energy with funds from the city of Franklin, Williamson County, and several private donors. This assessment is part of a community-wide collaborative effort to address how best to service the growing electrical demand in this region that incorporates up front the important ecological, agricultural, historic, and aesthetic resources.

We appreciate your response in November to our request for information. As you may know from communications with MTEMC, we have worked with them as well in providing two sets of information requests and have had a conference call with both your staff and MTEMC on separate occasions to discuss this assessment.

Based on TVA's response in November and a quick review of the information provided recently by MTEMC, we have attached a follow-up set of information requests. This list of questions is attached. We would like to note that this request is for actual documents and data. MTEMC, for example, just provided a computer run of their FY 2002 load growth study. We would hope that documents could be provided within 2 weeks so that the initial review of the data can be done.

We believe that this assessment is integral to the Environmental Assessment TVA is conducting of the proposed transmission line and proposed substation. The board's letter in November indicates that this review will be available for public input this summer. We strongly believe the assessment by Synapse Energy Economics needs to be incorporated into the EA process prior to the issuance of an EA. Thus, it appears appropriate for TVA to adjust the EA timing to accommodate the short time needed for Synapse to conduct their assessment that can be started as soon as they receive the data requested.

We would very much like to work with TVA and MTEMC in a collaborative manner on this assessment and the EA. As before, please provide the requested information directly to Steve Smith at the address below and he will forward it to David Schlissel at Synapse Energy Economics and to me.

1120

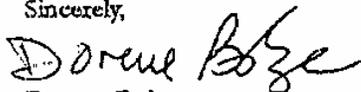
- 2 -

February 6, 2002

Steve Smith  
Executive Director  
Southern Alliance for Clean Energy  
P.O. Box 1842  
Knoxville, TN 37901  
(865)637-6055  
sasmith@cleanenergy.org

Please do not hesitate to contact me or Steve Smith regarding how we can help expedite this data gathering process.

Sincerely,



Dorene Bolze  
Executive Director  
(615) 591-9095  
DorieBolze@home.com

CC: Ike Zeringue  
Kate Jackson  
Terry Boston  
David Hall

February 6, 2002, letter from Harpeth River Watershed Association, Page 3 of 3

#### Follow-Up Requests to TVA

1. Reference TVA's November 5, 2001 response to Question No. 1 in Ms. Bolze's requests for information:
  - a. Provide copies of the load flow or system stability studies or analyses or other TVA documentation that form the basis for the statement that "TVA's assessment of the reliability and adequacy in the Franklin and Williamson County areas shows that considerable risks currently exist in which the loss of a single line could result in significant outages in the middle Tennessee area."
  - b. Provide a copy of the "[TVA] assessment of the reliability and adequacy in the Franklin and Williamson County areas" referenced in the quote in the part a. of this request.
  - c. Provide copies of the load flow or system stability studies or analyses or other TVA documentation that form the basis for the conclusion that the proposed 161-kV transmission line from Aspen Grove to Bingham will help reduce or alleviate the risks in the Franklin and Williamson County areas cited in the quote in part a. of this request.
2. Reference TVA's November 5, 2001 response to Question No. 2 in Ms. Bolze's requests for information. Provide copies of the load flow or system stability studies or analyses or other TVA documentation that form the basis for the conclusion that the adequacy of the supply in the area of Franklin and Williamson Counties will require the construction of a third 161-kV transmission line to the region.
3. Reference TVA's November 5, 2001 response to Question No. 3 in Ms. Bolze's requests for information. Provide copies of the projections of the growth rates for Franklin and Williamson Counties, and any supporting documents, that TVA has received from MTEMC since January 1, 1999.
4. Reference TVA's November 5, 2001 response to Question No. 4 in Ms. Bolze's requests for information. MTEMC has said that the referenced April 1999 power supply study was the "input to a one owner study for Bingham Substation" that they believe that TVA was conducting. Please provide copies of all TVA studies, analyses, assessments, or documentation that relied on the input provided by MTEMC in that April 1999 power supply study.
5. We understand from our telephone discussion with TVA personnel that TVA prepares annual assessments of transmission reliability and/or adequacy. Please provide the most recent two such assessments prepared by or for TVA.
6. Please provide three copies of maps that show the current and proposed TVA transmission system in the region and the current and proposed distribution system of MTEMC for Williamson County.

TVA's February 25, 2002, response to the February 6, 2002, letter from Harpeth River Watershed Association, Page 1 of 2

February 25, 2002

Mrs. Dorene Bolze  
Executive Director  
Harpeth River Watershed Association  
Post Office Box 1127  
Franklin, Tennessee 37065

Dear Ms. Bolze:

Thank you for your February 6 letter to TVA's Board of Directors regarding TVA's proposed 161-kV transmission line in the Franklin, Tennessee, area. I trust that the information provided by TVA and Middle Tennessee Electric Membership Cooperative as referenced in your letter has been helpful to you.

You attached a list of follow-up questions with instructions to forward the requested information directly to Dr. Stephen Smith, Southern Alliance for Clean Energy. This information was sent by letter from John Shipp to Dr. Smith on February 22.

We understand and have been as responsive as we can be to your request for actual documents and data. However, some of the documents you have requested cannot be released. In particular, our annual transmission assessment consists of extremely sensitive information which, for power system security reasons, TVA considers to be confidential. This information cannot be released and, in fact, would not be released through the Freedom of Information Act.

Please do not hesitate to contact Mr. Shipp regarding the information that has been provided. Mr. Shipp can be reached at telephone 423-751-3742. I understand that he has offered to arrange another teleconference or meeting with the appropriate TVA staff if that would be helpful to you.

Very truly yours,



Terry Boston

cc: See page 2

TVA's February 25, 2002, response to the February 6, 2002, letter from Harpeth River Watershed Association, Page 2 of 2

Mrs. Dorene Bolze  
Page 2  
February 25, 2002

cc: Mr. James O. Baker, President  
The Middle Tennessee Electric Membership Corporation  
555 New Salem Road  
Murfreesboro, Tennessee 37129

Dr. Stephen A. Smith, Executive Director  
Southern Alliance for Clean Energy  
Post Office Box 1842  
Knoxville, Tennessee 37901



**WILLIAMSON COUNTY**  
Elaine Anderson  
County Clerk  
P.O. Box 624  
Franklin, Tennessee 37065-0624

June 25, 2002

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Board of Directors  
Tennessee Valley Authority  
1101 Market Street MR4G  
Chattanooga, Tennessee 37042-2801

Attention: Elbert Fowler Tucker, Chief Executive Officer

RE: Environmental Impact Statement

Dear Board of Directors:

On June 10, 2002, the Williamson County Board of Commissioners adopted at its regular session the enclosed Resolution No. 6-02-24, RESOLUTION OF THE WILLIAMSON COUNTY COMMISSION CALLING FOR AN ENVIRONMENTAL IMPACT STATEMENT FOR ALL PLANNED ELECTRICAL INFRASTRUCTURE OUT TO 2020, INCLUDING THE PROPOSED HIGH VOLTAGE LINE FROM ASPEN GROVE TO THE PROPOSED BINGHAM STATION (certified copy enclosed).

The Williamson County Board of Commissioners are requesting the Tennessee Valley Authority Board of Directors to take into consideration the purposes set out in Resolution No. 6-02-24, at the next Board of Directors meeting.

Your consideration in this matter will be greatly appreciated.

Sincerely,

*Elaine Anderson*  
Elaine Anderson  
County Clerk

EA/mw

Enclosures

xc: Jim Baker, President - MTEM (55 New Salem Road, Murfreesboro, TN 37129)  
Dan Florida, Franklin District Manager-MTEM (2156 Edward Curd Lane, Franklin, TN 37068)

June 25, 2002, letter from Williamson County Clerk, Page 2 of 4

<b>STATE OF TENNESSEE, WILLIAMSON COUNTY</b>
I, Elaine Anderson, County Clerk of Williamson County, do hereby certify that the foregoing is a true and perfect copy of resolution: <u>RESOLUTION OF THE WILLIAMSON COUNTY COMMISSION CALLING FOR AN ENVIRONMENTAL IMPACT STATEMENT FOR ALL PLANNED ELECTRICAL INFRASTRUCTURE OUT TO 2020, INCLUDING THE PROPOSED HIGH VOLTAGE LINE FROM ASPEN GROVE TO THE PROPOSED BINGHAM STATION</u>
as the same appears of record in <u>Minute Book No. 21</u> Page <u>    </u> on file in my office at Franklin.
Witness my hand and seal, at office, this <u>25th</u> day of <u>June</u> , 2002.
<i>Elaine Anderson</i> Clerk
BY <i>Nartha L. Doolittle</i> D.C.

FILED 5/24/02  
ENTERED 12:50 P.M.  
CLARK ANDERSON COUNTY CLERK EA

Resolution No. 6-02-24

**RESOLUTION OF THE WILLIAMSON COUNTY COMMISSION CALLING FOR AN ENVIRONMENTAL IMPACT STATEMENT FOR ALL PLANNED ELECTRICAL INFRASTRUCTURE OUT TO 2020, INCLUDING THE PROPOSED HIGH VOLTAGE LINE FROM ASPEN GROVE TO THE PROPOSED BINGHAM STATION**

**WHEREAS**, a proposed seven-mile Tennessee Valley Authority (TVA) 161-kV transmission line across northern Franklin to connect the Aspen Grove substation to a proposed new substation, called Bingham, by Middle Tennessee Electric Membership Corporation (MTEMC) has generated a large amount of concern for important historic, aesthetic, and environmental reasons; and,

**WHEREAS**, both the Williamson County Commission and the City of Franklin have passed resolutions that have been sent to TVA opposing the routing of this proposed TVA transmission line; and,

**WHEREAS**, the TVA and MTEMC are currently planning at least five (5) additional new substations and association transmission lines in Williamson County; and,

**WHEREAS**, the Williamson County Commission is concerned that it has not had meaningful input in the planning, nor is well informed, of the electrical infrastructure development by TVA and MTEMC; and,

**WHEREAS**, the Williamson County Commission would like to work with TVA, MTEMC, the City of Franklin and others on a public planning process for electrical infrastructure growth in order to minimize the negative impacts on our county's historic, environmental and aesthetic character; and,

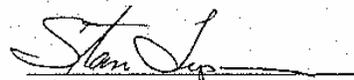
**WHEREAS**, TVA and MTEMC have yet to adequately explain how they have come to their conclusions and decision making; and,

**WHEREAS**, the Williamson County Commission does not believe that an Environmental Assessment of the proposed transmission line route, with potential findings of "no significant impact" gives a sufficient level of review to such an important decision;

**NOW, THEREFORE, BE IT RESOLVED**, that the Williamson County Board of Commissioners, meeting in regular session this the 10<sup>th</sup> day of June, 2002, hereby requests the TVA to conduct an Environmental Impact Statement (EIS) on all the potential infrastructure growth in the County and not elevate one piece at a time as the current Environmental Assessment process does. This EIS should also include and look at all possible alternatives, including a clear comparison of energy efficient alternatives; and,

**BE IT FURTHER RESOLVED**, that the County Clerk is directed to transmit a certified copy of this resolution to the Board of Directors for both Tennessee Valley Authority and Middle Tennessee Electric Membership Corporation.

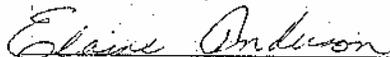
  
Clyde Pewitt - County Commissioner

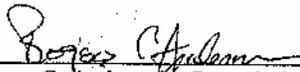
  
Stan Tyson - County Commissioner

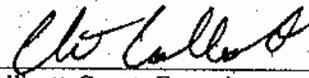
Resolution No. 6-02=24, continued

COMMITTEES REFERRED TO & ACTION TAKEN:

Property Committee For 6 Against 0  
Public Health Committee For 5 Against 0  
Commission Action Taken: For 24 Against 0 Pass 0 Out 0

  
Elaine Anderson County Clerk

  
Rogers C. Anderson, Commission Chairman

  
Clint Callicott, County Executive

6/20/02  
Date

(dg/TVALineImpactStudy)

October 28, 2002, joint letter from the city of Franklin, Tennessee, the Heritage Foundation of Franklin and Williamson Counties, Tennessee, the Harpeth River Watershed Association, and the Southern Alliance for Clean Energy, Page 1 of 8

October 28, 2002

RECEIVED

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2002 NOV -11 P 1:06

GLENN L. MCCULLOUGH, JR.  
CHAIRMAN

Board of Directors  
Tennessee Valley Authority  
400 W. Summit Hill Dr.  
Knoxville, Tennessee 37902-1499

Re: Aspen Grove-Bingham Transmission Line Project, Franklin, Williamson County,  
Tennessee

Ladies and Gentlemen:

As you know, the Tennessee Valley Authority ("TVA") has received a number of communications concerning the proposed Aspen Grove-Bingham Transmission Line Project (the "Project"). These communications have addressed a number of factors associated with the Project, including, among others:

- the environmental impact of the placement of the transmission line and the appropriate level of environmental analysis associated with the Project;
- the need for increased efficiency using current resources rather than increased capacity;
- the overall plan for electrical infrastructure within Franklin and Williamson County; and
- the intrusion of the transmission line over scenic gateways, historic properties, unspoiled farmland and floodplain and riverbank sites.

In addition to a significant amount of concern expressed by private citizens, both the Board of Mayor and Aldermen of the City of Franklin and the Williamson County Board of Commissioners have adopted resolutions addressed to TVA and the Middle Tennessee Electric Membership Corporation ("MTEMC"). The resolutions call for a public planning process to address utilities within Williamson County and, specifically, an environmental impact statement level of study for potential electrical infrastructure within Williamson County.

By letter dated August 2, 2001, MTEMC itself wrote to TVA, noting that an environmental impact statement on the Project was "inevitable" based on the number of sensitive river system crossings involved, the impaired status of the Harpeth and West Harpeth Rivers and the availability of other "less environmentally sensitive" routes. In light of the delay to the Project resulting from an environmental assessment followed by an environmental impact statement, MTEMC recommended that the current environmental assessment process be bypassed and that preparation of an environmental impact statement be initiated.

232249

October 28, 2002, joint letter from the city of Franklin, Tennessee, the Heritage Foundation of Franklin and Williamson Counties, Tennessee, the Harpeth River Watershed Association, and the Southern Alliance for Clean Energy, Page 2 of 8

Board of Directors  
Tennessee Valley Authority  
October 28, 2002  
Page 2

The complexity of this issue is perhaps best revealed by the uncertainty shown by TVA in identifying its proposed action. A number of "proposed routes" have been adopted and modified and the timeline for completion of the environmental assessment currently underway has been extended on multiple occasions. Most recently, we understand that an additional route has been proposed for the Project and that the environmental assessment is not expected to be available until early 2003.

All parties recognize that additional growth will occur in Franklin and Williamson County, although the amount and patterns of growth may differ significantly from the projections assumed for the Project. All parties also recognize the need to provide the electric needs of residents and businesses within Williamson County in a way that is safe, reliable and efficient.

These recognized needs have led these parties to urge TVA to initiate an environmental impact statement process with appropriate scoping. To date, however, TVA has persisted in preparation of an environmental assessment. This letter will provide the basis for our view that, in the event an environmental assessment of the Project leads to a Finding of No Significant Impact, such a finding and process would be legally deficient and subject to legal challenge. As a result, we renew our call for an environmental impact statement to be prepared on the Project.

1. **Applicable Legal Requirements for Environmental Analysis**

As you know, the National Environmental Policy Act ("NEPA"), 42 U.S.C. 4321, *et seq.* (1976) established requirements for environmental assessment to be followed by agencies of the federal government. The Council on Environmental Quality ("CEQ") has adopted regulations applicable to the NEPA process at 40 CFR, parts 1500 – 1508 (collectively, the "CEQ Regulations"), part of which require that agencies adopt procedures to implement NEPA and the CEQ regulations.

TVA has adopted procedures implementing NEPA and the CEQ regulations (45 FR 54511, as amended by 48 FR 19264) (collectively, the "TVA Guidelines") and is obligated to follow those guidelines in its decision making processes.

2. **Summary of Required Analysis Process**

As early as possible, the TVA office proposing to initiate an action will initially determine the environmental review required for a specific analysis. That office may determine that the action is categorically excluded as an action that normally does not have, either individually or cumulatively, a significant impact on the quality of the human environment and requires neither the preparation of an environmental assessment ("EA") or an environmental impact statement ("EIS"). TVA Guidelines, Section 5.2.

Alternatively, the office may determine that an EA is appropriate if the action is not categorically excluded to determine whether an EIS will be necessary. If so, the office may request public involvement in the preparation of the EA "as appropriate to best facilitate timely and meaningful public input to the EA process." TVA Guidelines Section 5.3.2.

October 28, 2002, joint letter from the city of Franklin, Tennessee, the Heritage Foundation of Franklin and Williamson Counties, Tennessee, the Harpeth River Watershed Association, and the Southern Alliance for Clean Energy, Page 3 of 8

Board of Directors  
Tennessee Valley Authority  
October 28, 2002  
Page 3

The EA will then determine whether an EIS is necessary or a Finding of No Significant Impact ("FONSI") can be reached, with appropriate notice to the public. In some cases TVA will make the FONSI available for public review and comment before a final determination is made. Those cases include, among others, those where the proposed action is similar to actions that require EIS preparation. TVA Guidelines Section 5.3.4(1).

In addition to those EA's that do not conclude with a FONSI, an EIS is required for the actions specified in Section 5.4.1 of the TVA Guidelines, including:

"4. Any major action, the environmental impact of which is expected to be highly controversial";

and

"5. Any other major action which will have a significant effect on the quality of the human environment."

The EIS process includes scoping, consideration of alternatives, preparation of a draft and final EIS, public comment and preparation of a record of decision.

In addition to the above, analysis of an action that potentially may affect floodplains or wetlands shall include a floodplain or wetlands evaluation as required by Section 5.7 of the TVA Guidelines. Of significance, "if at any time prior to commencement of the action it is determined that there is a practicable alternative that will avoid affecting floodplains or wetlands, the proposed action shall not proceed." TVA Guidelines Section 5.7.2.2. Actions affecting floodplains or wetlands also require additional notice and public comments provisions.

3. **Deficiencies of a Finding of No Significant Impact for the Project.**

If TVA were to determine that the EA currently underway for the project resulted in a FONSI, significant legal deficiencies would be present. This letter in no way attempts to exhaustively list or describe those deficiencies, but we believe any EA resulting in a FONSI would be deficient in the following respects:

(a) **The Environmental Assessment Would Fail to Conclude that an Environmental Impact Statement Is Required.**

As previously described, the TVA Guidelines require an EIS for major actions the environmental impacts of which are controversial or that will have a significant impact on the environment. The Project, as described, will have both controversial and significant environmental impacts.

(i) **Major Action.**

The CEQ Regulations define a "major Federal action" as those actions "with effects that may be major" where the term "major" reinforces but does not have a meaning independent of

October 28, 2002, joint letter from the city of Franklin, Tennessee, the Heritage Foundation of Franklin and Williamson Counties, Tennessee, the Harpeth River Watershed Association, and the Southern Alliance for Clean Energy, Page 4 of 8

Board of Directors  
Tennessee Valley Authority  
October 28, 2002  
Page 4

“significantly.” CEQ Regulations Section 1508.18. Thus, the significance of the Project in part determines whether the Project is “major.”

(ii) **Significance of the Project.**

The term “significantly” includes considerations of context and intensity. CEQ Regulations Section 1508.27. The context of the Project as a site-specific action is clearly dependent on the effects on the local area into which the Project is to be inserted, but also must be considered in the context of its impact on future electrical infrastructure decisions that will effect at least Williamson County.

The CEQ Regulations require that severity considerations include adverse impacts on the unique characteristics of the area, including prime farmlands, wetlands and scenic rivers, all of which are located in the proposed route for the Project. In addition, severity includes whether the effects on the quality of the human environment are likely to be highly controversial, whether the action may represent a decision in principle about a future consideration and whether the action is one of a number of actions that are individually insignificant but cumulatively significant.

Rather than an isolated action pertaining only to the line from Aspen Grove to the Bingham substation, the Project is an integral step in development of an electric infrastructure that will serve the entire county. Those considerations were at the core of the request by the Franklin and Williamson County governments for overall and coordinated planning of electric supply infrastructure. Consequently, the decision on the Project represents a decision in principle about future considerations and one of a number of infrastructure decisions that must be reviewed cumulatively.

Taken together, the context and severity of the environmental impacts attributable to the Project require an EIS.

(iii) **Controversial Environmental Impacts**

The TVA Guidelines appropriately establish the controversial nature of the environmental impacts as a separate basis for requiring an EIS, although this issue also goes to the severity of the impacts. We have previously alluded to the requests for an EIS by both local government entities and the local electric utility. Significant community interest and concern is present, as evidenced by the attendance at public presentations concerning the Project offered by TVA.

Overwhelming consensus exists among responsible and diverse parties that the Project holds the potential for significant environmental impact. Consequently, an EIS is required pursuant to TVA Guideline 5.4.1(4).

(b) **The Project Represents a Splitting of a Major Action With Significant Impact to the Environment, or Fails to Consider the Cumulative Effect of the Action**

October 28, 2002, joint letter from the city of Franklin, Tennessee, the Heritage Foundation of Franklin and Williamson Counties, Tennessee, the Harpeth River Watershed Association, and the Southern Alliance for Clean Energy, Page 5 of 8

Board of Directors  
Tennessee Valley Authority  
October 28, 2002  
Page 5

The Project is the only current action being considered to provide electric resources to Williamson County, but others are inevitable. TVA itself believes that considerable growth will occur in Williamson County and that additional electrical facilities will be needed. The Project is necessarily a portion of a grid that will ultimately serve that new growth, the effects of which will have a cumulative impact, defined by the CEQ Regulations as the incremental effect of the current action when added to other "reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such actions." Section 1508.7.

Rather than a series of incremental decisions, each of which may be determined insignificant, the planning for electrical facilities should consist of an overall plan.

(c) **The Environmental Assessment Will Be Based on Faulty Assumptions Concerning Growth.**

The Project is based on projections of significant growth in western Williamson County. Those projections have become more straightforward with adoption of the Urban Growth Boundary plan for Williamson County, as required by Public Chapter 1101. The plan adopts specific areas for urban growth of municipalities and planned growth areas within the county.

Notably, the area west and south of the Project does not fall into any growth area and is therefore designated as rural. According to Tennessee law, rural property is territory "that, over the next twenty (20) years, is to be preserved as agricultural lands, forests, recreational areas, wildlife management areas or for uses other than high density commercial, industrial or residential development." T.C.A. §. 6-58-106(c)(1)(C). Environmental analysis of the Project that assumes significant growth in the rural areas therefore runs contrary to the dictates of Tennessee law. Overall planning should instead focus on the urban growth and planned growth areas as the areas of likely growth for the next twenty years.

If the basis for the action, and rejection of a "no action" alternative is significant growth in the rural area adjacent to the Bingham substation, or in those areas surrounding projected Highway 840 (as MTEM C projects), those assumptions are faulty.

(d) **The Environmental Assessment Will Fail to Properly Consider the No Action Alternative.**

TVA and MTEM C have been given information that establishes a significant potential reduction in electrical demand in Williamson County by the incorporation of energy efficient strategies and alternative solutions. A study titled The Energy Efficiency Potential in Williamson County, Tennessee dated April 4, 2002 and prepared by Synapse Energy Economics, Inc. (the "Efficiency Study") has been prepared at the request of and funded by public and private interests in Williamson County and has been previously provided to TVA and MTEM C

The Efficiency Study, based on data made available by MTEM C, found that electricity demand in Williamson County could be reduced by at least 13.9 percent and as much as 23 percent from current projections over the next ten years and even more in the twenty year projection. While these reductions are dependent on TVA and MTEM C cooperation and even

October 28, 2002, joint letter from the city of Franklin, Tennessee, the Heritage Foundation of Franklin and Williamson Counties, Tennessee, the Harpeth River Watershed Association, and the Southern Alliance for Clean Energy, Page 6 of 8

Board of Directors  
Tennessee Valley Authority  
October 28, 2002  
Page 6

leadership, reductions in demand must necessarily alter the projected need and placement of transmission infrastructure.

Any proposed action must include an assessment of the need for the Project, including alternatives to the proposed action. If the EA is based on electricity demands based on current practices, the no action alternative to the Project will not be provided sufficient analysis.

(e) **The Environmental Assessment Will Not Give Sufficient Attention to Wetlands and Floodplains.**

Significant floodplain, wetlands and scenic river watersheds will be impacted by the Project. Attached as Exhibit A to this letter is a Statement of Concern concerning the Ecological Degradation to West Harpeth and Harpeth Rivers associated with the Project dated July 18, 2001 and prepared by the Harpeth River Watershed Association. The Statement of Concern provides significant specific information on the potential damage to floodplain areas in the West Harpeth corridor and other waterways in Williamson County. Similar concerns are present for wetland resources within the area impacted by the Project.

The TVA Guidelines require a consideration of other practicable alternatives of actions that affect floodplains and wetlands. A failure to consider alternative routes, the use of energy efficient alternatives or overall planning for the county that would not entail these impacts would be a deficiency of the EA.

(f) **The Public Involvement in the Environmental Assessment Process Has Suffered from Inconsistent Information and Contradictory Descriptions of the Project.**

TVA has commendably and appropriately determined that significant public involvement in the EA process is necessary. Unfortunately, the information provided to the public has been contradictory and inconsistent, detracting from the effectiveness of the public involvement. Unless the public is given reliable and consistent information, TVA's efforts would fail to "facilitate timely and meaningful public input to the EA process." TVA Guidelines Section 5.3.2.

Proposed routes that have been presented at various public meetings and to a number of private individuals have differed significantly from time to time. In addition, the rationale and justification of the need for the Project have been inconsistently presented. As a result, the public involvement has been reacting to a number of descriptions of the proposed action and has had difficulty providing specific input to whatever form and route the Project may take.

Although the various statements of the Project including the route selection may reflect TVA's responsiveness to expressed concern, an uncharitable view would conclude that the TVA was unclear in its proposed action or even purposely confusing those who have expressed concern over the Project. While no such suggestion is made here, the public process has failed to clearly communicate the proposed action for the Project. As a result, TVA's goal of "meaningful public input" will necessarily be frustrated.

October 28, 2002, joint letter from the city of Franklin, Tennessee, the Heritage Foundation of Franklin and Williamson Counties, Tennessee, the Harpeth River Watershed Association, and the Southern Alliance for Clean Energy, Page 7 of 8

Board of Directors  
Tennessee Valley Authority  
October 28, 2002  
Page 7

(g) **The Environmental Assessment Fails to Properly Consider Indirect Effects of the Action.**

The EA is obligated to consider not only the immediate, direct effects of the Project, but also indirect effects. Those indirect effects include "growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate." CEQ Regulations 1508.8(b). Given the rural nature of the area to be affected by the Project, these "induced changes" may be the most environmentally significant aspect of the Project.

These concerns lay at the heart of the requests by local governments, including the City of Franklin and Williamson County, for comprehensive planning, to include utility infrastructure. These governments are currently and conscientiously working to develop land use plans for this area. Rather than consult with these governments and be educated as to likely and beneficial growth patterns, however, TVA and MTEMC are apparently electing to develop infrastructure with indifference to the significant and probable indirect effects of the Project.

While unwise at best, this course also violates the requirement for consideration of indirect impacts required by federal regulations.

4. **Summary.**

For the reasons set forth above, we believe that federal law and regulations, including those of the TVA itself, require that an environmental impact analysis be conducted prior to any decision on the implementation of the Project. More significantly, however, we believe the Project's scope should be appropriately broadened to an overall plan of the electrical infrastructure needs of Williamson County for at least the next twenty years.

Such a study makes business and environmental sense. Given the recent adoption of the Urban Growth Boundary guidelines, the potential for energy efficient practices, the significant ongoing planning efforts of local governments and the desire expressed by Franklin and Williamson County governing bodies, TVA and MTEMC have an unprecedented opportunity to create a plan for electrical transmission infrastructure that will complement and enhance growth in Williamson County.

Consistent with the recommendations of MTEMC, we urge TVA to forego an EA level of analysis for the Project and to immediately turn to an EIS. We remain available for consultation on this issue at your convenience.

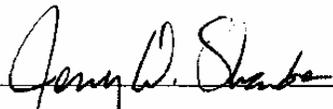
Respectfully submitted,

[SIGNATURES APPEAR ON FOLLOWING PAGE]

October 28, 2002, joint letter from the city of Franklin, Tennessee, the Heritage Foundation of Franklin and Williamson Counties, Tennessee, the Harpeth River Watershed Association, and the Southern Alliance for Clean Energy, Page 8 of 8

Board of Directors  
Tennessee Valley Authority  
October 28, 2002  
Page 8

CITY OF FRANKLIN, TENNESSEE

By:   
Print Name: Jerry Sharber  
Title: Mayor

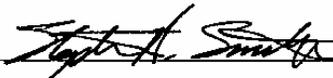
HERITAGE FOUNDATION OF FRANKLIN & WILLIAMSON COUNTY, TENNESSEE

By:   
Print Name: Mary Pearce  
Title: Executive Director

HARPETH RIVER WATERSHED ASSOCIATION

By:   
Print Name: Dorene Bolze  
Title: Executive Director

SOUTHERN ALLIANCE FOR CLEAN ENERGY

By:   
Print Name: Stephen A. Smith  
Title: Executive Director

Enclosures As Stated

cc: Kathryn J. Jackson, Executive Vice President, River Systems Operations & Environment  
Terry Boston, Executive Vice President, Transmission & Power Supply

September 27, 2004, letter from Joan M. Dodd (TVA) to Ms. Dorene Bolze, Harpeth River Watershed Association, transmitting Erosion Control Plan (Appendix X), Page 1 of 2



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

September 27, 2004

Ms. Dorene Bolze  
Executive Director  
Harpeth River Watershed Association  
P. O. Box 1127  
Franklin, TN 37065

Dear Ms. Bolze:

This letter is a follow up to the meeting between Harpeth River Watershed Association (HRWA) staff and TVA staff on August 17, 2004, concerning the proposed TVA transmission line project in Franklin and Williamson Counties. The meeting attendees reached agreement on the techniques to be used for bank stabilization and transmission right-of-way revegetation at the three points at which the proposed transmission line route will cross the Harpeth River. As was discussed at the meeting and in a subsequent telephone conversation, the plans may be modified either as a result of Corps of Engineers or State of Tennessee permit requirements or as a result of negotiations with the involved landowners.

The techniques and methods to which we agreed are outlined in a draft Appendix to TVA's final Environmental Assessment (EA) which I am enclosing. The EA will commit TVA to take these actions to limit erosion and stabilize the river bank. We appreciate your interest in the well-being of the Harpeth River watershed and we appreciate your cooperation and advice in developing a plan which protects these resources and allows TVA to meet our obligations to our customers.

Sincerely,

A handwritten signature in black ink that reads "Joan M. Dodd".

Joan M. Dodd, P.E.  
Senior Manager  
Transmission Line Projects

JMD:CSR  
Enclosures  
cc (w/enclosures): See Page 2

September 27, 2004, letter from Joan M. Dodd (TVA) to Ms. Dorene Bolze, Harpeth River Watershed Association, transmitting Erosion Control Plan (Appendix X), Page 2 of 2

Ms. Dorene Bolze  
Page 2  
September 27, 2004

cc (w/enclosures):

Mr. John McFadden  
Harpeth River Watershed Association  
P.O. Box 1127\1  
Franklin, TN 37066

H. S. Barger, MR 4G-C  
Don Becker, WT11A-K  
R. A. Harris, MR 4B-C  
W. D. Hall, MR 4B-C  
Alicia Lewis, MR 4B-C  
Anita Masters, MR 2T-C  
James Hagerman, WT 10D-L  
R. E. Sperry, MR 4G-C

MEMORANDUM OF AGREEMENT  
PURSUANT TO 36 CFR PART 800 BETWEEN THE TENNESSEE VALLEY AUTHORITY AND  
THE TENNESSEE STATE HISTORIC PRESERVATION OFFICER

WHEREAS, the Tennessee Valley Authority (TVA) proposes to construct a 161-kV transmission line (TL) with a 100 ft right-of-way (ROW) easement to connect the existing Aspen Grove substation to a substation to be constructed by Middle Tennessee Electric Membership Corporation (MTEMC); and

WHEREAS, TVA's preferred routing for the proposed TL from the Aspen Grove substation to the proposed MTEMC substation is depicted in Figure 1; and

WHEREAS, TVA has determined that the construction of the Aspen Grove TL and substation will have an effect upon historic properties that are eligible for listing in the National Register of Historic Places (NRHP): the Harpeth River Historic District (HRHD, or the District) and WM-57 (James B. Davis House), located in Williamson County, as well as the potential to affect other historic properties that are eligible for inclusion in the NRHP; and

WHEREAS, TVA has consulted with the Tennessee State Historic Preservation Officer (SHPO) pursuant to 36 CFR Part 800, the regulations of the Advisory Council on Historic Preservation (Council) implementing Section 106 of the National Historic Preservation Act (NHPA) (16 U.S.C. 470f); and

WHEREAS, TVA has also consulted with the Eastern Band of Cherokee Indians and the Muscogee (Creek) Nation of Oklahoma; the Eastern Band of Cherokee Indians and the Muscogee (Creek) Nation of Oklahoma are concurring parties to this Agreement; and

WHEREAS, TVA in consultation with the SHPO has determined that the proposed TL and substation would have an adverse effect on some contributing historic agricultural resources, such as the District's rural setting, agricultural buildings and structures; and

WHEREAS, the proposed TL also has the potential to affect locations that have been identified by geomorphological testing as having the potential for deeply buried archaeological deposits but have not yet been investigated; and

WHEREAS, the area of potential effect (APE) of the proposed Aspen Grove TL route and the historic properties eligible for or listed in the NRHP within the APE are clearly delineated in "Documentation of Identified Historic Properties" and the reports *Archaeological Survey of the Aspen Grove 161-kV Transmission Line in Williamson County, Tennessee, Historical and Architectural Survey of the Proposed Aspen Grove-Bingham 161-kV Transmission Line Right-of-Way, Williamson County, Tennessee, Archaeological Survey of the Aspen Grove 161-kV Transmission Line (Alternate D) in Williamson County, Tennessee, Reconnaissance Level Survey of Potential Substation Sites for the Aspen Grove-Bingham 161-kV Transmission Line, Williamson County, Tennessee, Phase I Historic Architecture Survey and Archaeological Reconnaissance of Two Proposed Alternate Routes and a Substation Footprint for the Proposed TVA Aspen Grove-Bingham 161-kV Transmission Line, Williamson County, Tennessee, and Historical and Architectural Survey and Documentation for Effect Under 36 CFR 800 Evaluation: Proposed State Route 397 Extension (Mack Hatcher Parkway) from US 31 (SR 6) South of Franklin to US 431 (SR 106) North of Franklin, Williamson County, Tennessee*, and these documents are made a part of this Agreement by reference as Appendices A and B respectively; and

WHEREAS, in order to avoid, minimize, or mitigate the adverse effects of the undertaking, TVA shall use a phased process in applying the criteria of adverse effect consistent with phased identification and evaluation efforts conducted pursuant to 36 CFR Part 800.4 (b)(2);

NOW THEREFORE, TVA and the SHPO agree that the undertaking shall be implemented in accordance with the following stipulations in order to take into account the effect of the undertaking on historic properties.

### Stipulations

TVA shall ensure that the following stipulations are carried out:

#### 1. IDENTIFICATION:

a. Phase I archaeological and historic architectural surveys have been conducted for the proposed TL ROW and substation. Should the proposed TL and substation be altered in the course of design within the designated ROW, TVA, in consultation with the SHPO and other consulting parties, shall conduct a survey to identify any previously unrecorded historic properties within the revised APE. The survey shall be carried out in a manner consistent with the Secretary of the Interior's Standards and Guidelines for Identification (48 FR 44720-23) and the SHPO Standards and Guidelines for Architectural and Archaeological Resource Management Studies. TVA shall submit draft and final reports to the SHPO and all consulting parties for comment within a thirty (30) day period.

b. The proposed TL route contains several areas that were identified by the Phase I archaeological survey as having a "high" to "very high" potential for deeply buried archaeological deposits (Appendix B). Should the design of the TL require the placement of a structure within one of these previously identified areas, subsurface archaeological survey via backhoe trenches shall be carried out to identify any deeply buried archaeological deposits. The scope of work (SOW) will be developed in consultation with the SHPO prior to the implementation of the survey. TVA shall submit draft and final reports to the SHPO and all consulting parties for comment within a thirty (30) day period.

#### 2. EVALUATION:

TVA, in consultation with the SHPO and other consulting parties, shall conduct investigations to evaluate the significance of the following historic resources:

a. Only those archaeological sites which have been determined potentially eligible for listing in the NRHP and would be adversely affected by the construction of the TL, substation, and its accompanying infrastructure; and

b. Only those above-ground historic resources which have not been previously evaluated or require further evaluation.

For those potentially eligible archaeological sites that may be adversely affected, a Phase II site evaluation shall be conducted in a manner consistent with the Secretary of the Interior's Standards and Guidelines for Identification (48 FR 44720-23) and the SHPO Standards and Guidelines for Architectural and Archaeological Resource Management Studies. The SOW will be developed in consultation with the SHPO and other consulting parties prior to the implementation of the survey. TVA shall submit draft and final reports to the SHPO and all consulting parties for comment within a thirty (30) day period.

Properties which have been evaluated and have been found to meet NRHP criteria shall be considered historic properties. Should a dispute arise on the eligibility of a historic property, TVA will consult with the SHPO to resolve the objection. If TVA and the SHPO do not agree, or if the Council or the Secretary of the Interior (Secretary) so request, TVA shall obtain a determination of eligibility from the Secretary pursuant to 36 CFR Part 63. If an Indian tribe that attaches religious

and cultural significance to a property off tribal land does not agree, it may ask the Council to request the TVA Federal Preservation Officer to obtain a determination of eligibility.

3. TREATMENT PLAN:

a. AVOIDANCE:

TVA, in consultation with the SHPO and other consulting parties, shall ensure that historic properties determined eligible for listing in the NRHP shall be avoided whenever prudent and feasible. Adverse effects to be avoided are effects that may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, association, or potential to yield data important to history or prehistory. Adverse effects may also include reasonably foreseeable effects caused by the undertaking that may occur later in time, be further removed in distance, or be cumulative. The following measures should be taken to avoid adverse effects to historic properties:

1. The locations of archaeological sites will be provided to TL designers so that locating a TL structure, substation, or infrastructure within its identified boundaries could be avoided if feasible.
2. The locations of historic structures will be provided to TL designers so that locating TL structures and substation within the viewshed of these properties could be avoided if feasible.
3. Sensitive archaeological areas within the TL's ROW should be noted on the line's Plan and Profile sheets that are used in construction and maintenance operations. Any special conditions placed on that area for construction and maintenance of the line should be detailed on these sheets.

b. VISUAL MITIGATION:

Appropriate treatment measures to minimize or mitigate visual effects may not be apparent until the design plans for the TL and substation have been finalized. At that time, TVA will develop and implement, in consultation with the SHPO and other consulting parties, a visual treatment plan for the HRHD and any contributing resources within that district that would be visually affected by the proposed undertaking. The following measures shall be included in a visual treatment plan for a NRHP eligible or listed historic district, structure, or contributing resource.

1. The use of single pole steel structures within the boundaries of the HRHD and within the viewsheds of historic structures.
2. The use of "Franklin Green" or other unobtrusive colors to paint the TL structures within the HRHD APE in order to better blend these structures with the rural setting.
3. Modifications (i.e., structure height, span distance) within the preferred TL route that minimize its effects on a sensitive area of the district, a specific historic structure, or any other contributing resource.
4. The use of vegetation plantings, or earthen berms, or non-obtrusive paint colors, or other appropriate and feasible means, or combinations of these, for reducing the visual impact.

c. ARCHAEOLOGICAL DATA RECOVERY:

TVA shall develop and implement, in consultation with the SHPO and other consulting parties, an archaeological data recovery plan for eligible archaeological sites that cannot be feasibly avoided by the TL, substation, or infrastructure construction.

4. REPORTS:

TVA shall ensure that all historical and archaeological investigations undertaken for compliance with this Agreement are recorded in formal written reports that meet the Secretary of Interior's Standards and Guidelines for Identification (48 FR 44720-23) and the Tennessee SHPO Standards and Guidelines for Architectural and Archaeological Resources Management Studies.

The SHPO and other consulting parties shall be afforded thirty (30) days to review and comment on any archaeological or historical reports submitted by TVA in accordance with this Agreement.

5. PHASED COMPLIANCE:

In order to avoid, minimize, or mitigate the adverse effects of the undertaking, TVA shall use a phased process in applying the criteria of adverse effect consistent with phased identification and evaluation efforts conducted pursuant to 36 CFR Part 800.4 (b)(2).

6. TREATMENT OF HUMAN REMAINS:

a. Whenever feasible, the preferred treatment of Native American human remains and non-Native American human remains shall be preservation in place. TVA shall assess revisions in the proposed TL design and construction methods to determine whether preservation *in situ* is feasible. Whenever TVA determines that preservation of Native American human remains *in situ* is not feasible, TVA will seek the opinion of consulting Indian tribes regarding TVA's determination.

b. When preservation in place is not feasible, TVA, in consultation with the SHPO and other consulting parties shall ensure that the treatment of any human remains discovered within the project area complies with all state and federal laws, including the Native American Graves Protection and Repatriation Act (NAGPRA), concerning archaeological sites and treatment of human remains. Should human remains be encountered during historic properties investigations or post-review discovery, all ground disturbing activities will be ceased immediately.

TVA shall immediately notify the Williamson County Coroner, the State Archaeologist, the SHPO, the Eastern Band of Cherokee Indians and the Muscogee (Creek) Nation of Oklahoma should any human remains and/or grave associated artifacts be encountered in connection with the undertaking covered by this Agreement. TVA will notify all consulting parties within forty-eight (48) hours and invite them to comment on any plans developed to treat the human remains. TVA, in consultation with the SHPO and other consulting parties, shall ensure that those remains be treated in a manner that is consistent with the Advisory Council on Historic Preservation's "Policy Statement Regarding the Treatment of Human Remains and Grave Goods" (1988), and in accordance with Tennessee Code Annotated (T.C.A.) 46-4-101 et seq. "Termination of Use of Land as a Cemetery," and T.C.A. 11-6-116b, "Notification and Observation," and T.C.A. 11-6-119 "Reinterment" with implementing Tennessee Rules and Regulations Chapter 0400-9-1 "Native American Indian Cemetery Removal and Reburial."

7. TIMETABLE FOR COMPLIANCE

a. Consistent with Stipulation 5, TVA shall ensure that a phased process for the identification, evaluation and treatment of historic properties is implemented in consultation with the SHPO and other consulting parties prior to any TL, substation, or infrastructure construction.

b. TVA will develop a treatment plan in consultation with the SHPO and other consulting parties to avoid, minimize, or mitigate adverse effects to historic properties within thirty (30) days of selection of a preferred TL route, substation, and infrastructure construction.

c. The SHPO and other consulting parties shall have thirty (30) days upon receipt to review and comment on all reports of investigation and proposed treatment plans.

#### 8. ADMINISTRATIVE CONDITIONS

a. If Stipulations 1 - 7 have not been implemented within three (3) years from the date of this Agreement's execution, this Agreement shall be considered null and void, unless the consulting parties have agreed in writing as provided in Paragraph 8.b. below to an extension for carrying out its terms. Upon this Agreement becoming null and void, TVA, the SHPO, and other consulting parties will resume consultation pursuant to 36 CFR Part 800.

b. If Stipulations 1 - 7 have not been implemented within three (3) years from the date of this Agreement's execution TVA, the SHPO, and other consulting parties shall review the Agreement to determine whether the Agreement should be extended. If an extension is deemed necessary, TVA, the SHPO, and other consulting parties will consult in accordance with 36 CFR Part 800.6(c) to make appropriate revisions to the Agreement.

c. The signatories to this Agreement may agree to amend the terms of the Agreement. Such amendment shall be effective upon the signatures of both signatories to this Agreement, and the amendment shall be appended to the Agreement as an attachment.

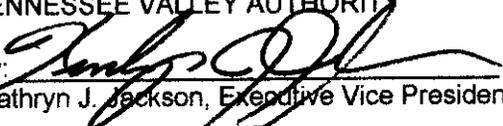
d. Should any consulting party object within thirty (30) days after receipt of any documents provided for review pursuant to this Agreement, TVA shall consult with the objecting party to resolve the objection.

e. If either signatory to this Agreement determines that the terms of the Agreement cannot be carried out, the signatories shall consult to seek an amendment to the Agreement. If the Agreement is not amended, either signatory may terminate the Agreement. TVA shall either execute a new Agreement pursuant to 36 CFR Part 800.6(c)(1) or request the comments of the Council pursuant to 36 CFR Part 800.7(a).

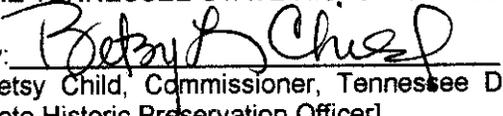
Execution of this Agreement by TVA and the SHPO, and implementation of its terms, evidence that TVA has taken into account the effects of the undertaking on historic properties, and TVA has complied with its obligations under Section 106 of NHPA.

**SIGNATORIES:**

TENNESSEE VALLEY AUTHORITY

By:  Date: 10.5.04  
[Kathryn J. Jackson, Executive Vice President, RSO&E]

THE TENNESSEE STATE HISTORIC PRESERVATION OFFICER

By:  Date: 10/11/04  
[Betsy Child, Commissioner, Tennessee Department of Conservation and Environment, and State Historic Preservation Officer]

**CONCURRENCE BY OTHERS:**

THE EASTERN BAND OF THE CHEROKEE INDIANS

By: \_\_\_\_\_ Date: \_\_\_\_\_

THE MUSCOGEE (CREEK) NATION OF OKLAHOMA

By: \_\_\_\_\_ Date: \_\_\_\_\_

CITY OF FRANKLIN

By: \_\_\_\_\_ Date: \_\_\_\_\_

TENNESSEE DEPARTMENT OF TRANSPORTATION

By: \_\_\_\_\_ Date: \_\_\_\_\_

MIDDLE TENNESSEE ELECTRIC MEMBERSHIP CORPORATION

By: \_\_\_\_\_ Date: \_\_\_\_\_

## Appendix A

## DOCUMENTATION OF IDENTIFIED HISTORIC PROPERTIES

Table 1. Historic and Architectural Resources

\*resources listed in bold are contributing elements to the HRHD

Resource	NRHP Status	Potential Effects
HS-1	Ineligible	N/A
HS-2	Ineligible	N/A
HS-3	Eligible	Visual effect from main corridor – Not adverse
HS-4	Ineligible	N/A
HS-5	Ineligible	N/A
HS-6	Ineligible	N/A
HS-7	Ineligible	N/A
<b>WM-53</b>	Listed	No effect
<b>WM-54</b>	Listed	No effect
<b>WM-55</b>	Eligible	No effect
<b>WM-56</b>	Eligible	Visual effect from main corridor and Alts. B, C, North or South – Not adverse
<b>WM-57</b>	Eligible	Visual effect from Alts. A, D, or South – Not adverse; Adverse visual effect from main corridor and Alt. B
<b>WM-59</b>	Listed	Visual effect from Alt. A – Not adverse
WM-69	Listed	Visual effect—not adverse
WM-70	Listed	Visual effect—not adverse
WM-72	Listed	Visual effect—not adverse
WM-109	Listed	Visual effect—not adverse
WM-110	Listed	Visual effect—not adverse
WM-111	Ineligible	N/A
WM-112	Ineligible	N/A
WM-963	Ineligible	N/A
<b>WM-982</b>	Eligible	No effect
<b>WM-992</b>	Eligible	Visual effect from Alt. B, D, or North — Not adverse
<b>WM-993</b>	Listed	Visual effect from main corridor and Alts. A, B, or C — Not adverse
<b>WM-994</b>	Ineligible	N/A
<b>WM-996</b>	Listed	Visual effect from main corridor – Not adverse
WM-997	Ineligible	N/A
WM-1001	Ineligible	N/A
<b>WM-1150</b>	Eligible	Visual effect from main corridor and Alts. B, D, North, or South — Not adverse; Adverse visual effect from Alt. C
Harpeth River Historic District	Eligible	Adverse effects from main corridor and Alts. B or C

Table 2. Archaeological Resources

<b>Resource</b>	<b>NRHP Status</b>	<b>Potential Effects</b>
40WM96	Not eligible	N/A
40WM268	Not eligible	N/A
40WM270	Not eligible	N/A
40WM271	Eligible	Potential effect
40WM294	Not eligible	N/A
40WM298	Not eligible	N/A
40WM299	Not eligible	N/A
40WM300	Not eligible	N/A
40WM301	Not eligible	N/A
40WM302	Not eligible	N/A
40WM309	Not eligible	N/A

**Appendix B**

## Barrett, Jared

2003 Archaeological Survey of the Aspen Grove 161-kV Transmission Line (Alternate D) in Williamson County, Tennessee. Report submitted to the Tennessee Valley Authority, Cultural Resources, Norris, Tennessee.

## Ezell, Raymond

2001 Archaeological Survey of the Aspen Grove 161-kV Transmission Line in Williamson County, Tennessee. Report submitted to the Tennessee Valley Authority, Cultural Resources, Norris, Tennessee.

## Karpynec, Ted

2003a Historical and Architectural Survey of the Proposed Aspen Grove-Bingham 161-kV Transmission Line Right-of-Way Williamson County, Tennessee. Report submitted to the Tennessee Valley Authority, Cultural Resources, Norris, Tennessee.

2003b Reconnaissance Level Survey of Potential Substation Sites for the Aspen Grove-Bingham 161-kV Transmission Line, Williamson County, Tennessee. Report submitted to the Tennessee Valley Authority, Cultural Resources, Norris, Tennessee.

## Thompson and Associates

2004 Historical and Architectural Survey and Documentation for Effect Under 36 CFR 800 Evaluation: Proposed State Route 397 Extension (Mack Hatcher Parkway) from US 31 (SR 6) South of Franklin to US 431 (SR 106) North of Franklin, Williamson County, Tennessee. Thompson and Associates, Preservation Planners. Nashville. Report submitted to the Tennessee Department of Transportation, Nashville, Tennessee.

## TRC

2004 Phase I Historic Architecture Survey and Archaeological Reconnaissance of Two Proposed Alternate Routes and a Substation Footprint for the Proposed TVA Aspen Grove-Bingham 161-kV Transmission Line, Williamson County, Tennessee. Report submitted to the Tennessee Valley Authority, Cultural Resources, Norris, Tennessee.

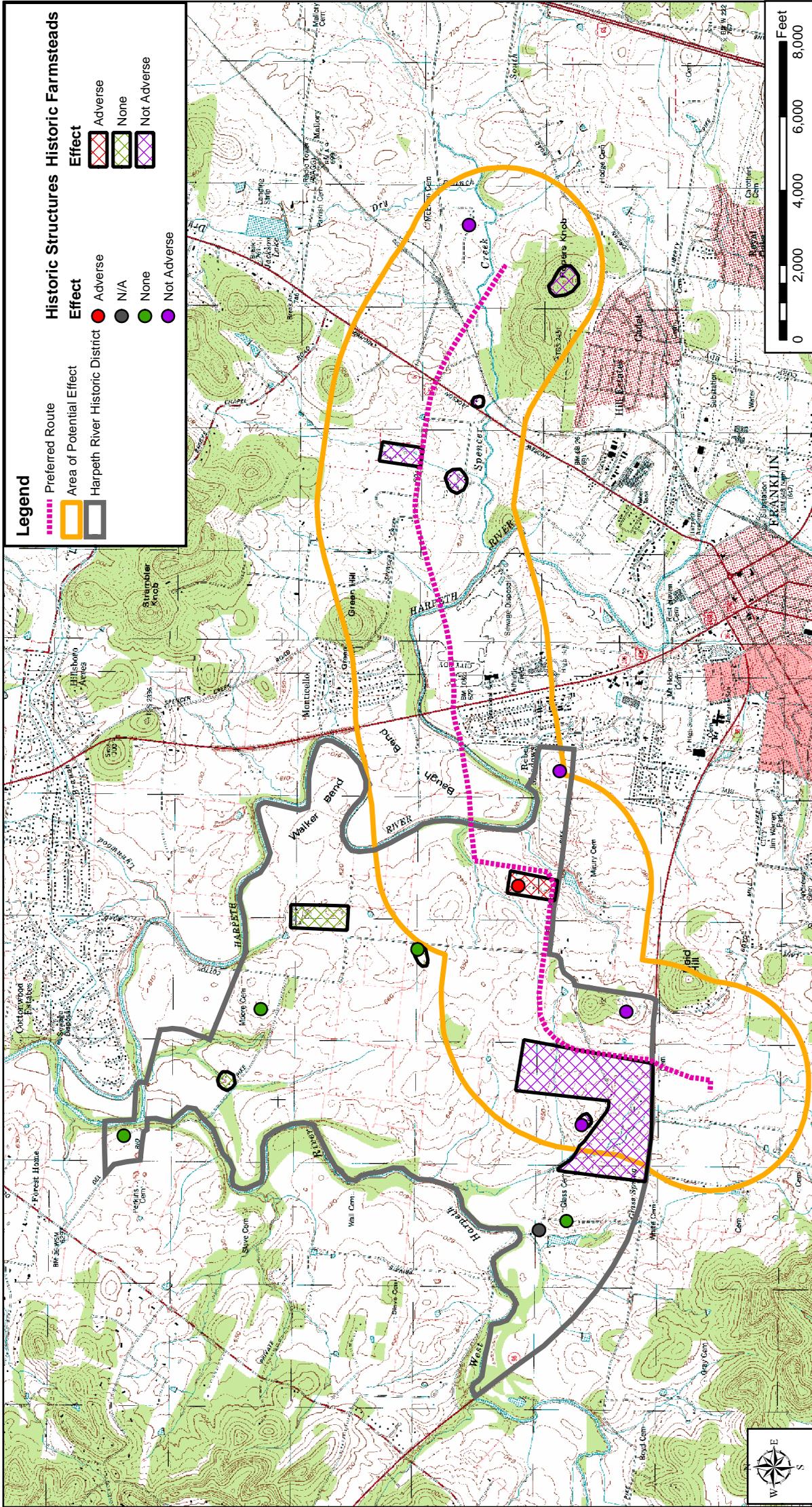


Figure 1. Aspen Grove Transmission Line Area of Potential Effect

**Public Comments and Responses on the Draft Environmental Assessment  
for the Aspen Grove 161-kV Transmission Line  
in Williamson County, Tennessee**

**Introduction**

The Draft Environmental Assessment (DEA) for the Aspen Grove 161-kV Transmission Line in Williamson County, Tennessee, was distributed for comments in February 2003. Members of the public and interested agencies provided written or oral comments on the DEA at a public meeting held on February 27, 2003 in Franklin, Tennessee, or by surface or electronic mail during the comment period. Almost all comments were received by the end of the comment period on March 14, 2003.

TVA received a total of 110 sets of comments on this DEA from 113 individuals, 4 organizations, and 4 interested agencies. A total of 88 people registered at the public meeting.

TVA has reviewed all of the comments. Wherever possible, comments with similar themes were grouped or edited together; much care was taken to provide for efficiency and better understanding, while preserving their meaning and the intent of the authors. Responses were prepared for all comments by TVA staff. Names of persons providing comments and those attending the public meeting are listed below.

**List of Those Providing Comments**

No.	Commenters	City and State
1	Andy Anderson	
2	Randy Bates	Franklin, Tenn.
3	Ann F. Bell	
4	The Honorable Marsha Blackburn, Representative in Congress	Franklin, Tenn.
5	Dorie Bolze, Harpeth River Watershed Association	Franklin, Tenn.
6	Mary Brockman, Williamson County Commissioner	
7	Gerald Brown	
8	David Bryant	
9	Kim Cantrell	Franklin, Tenn.
10	Don Cates	Franklin, Tenn.
11	Louise C. Cline	Franklin, Tenn.
12	Paula Covington	Franklin, Tenn.
13	Barbara Cragg	
14	David DeLoach	Franklin, Tenn.
15	Tina DeLoach	Franklin, Tenn.
16	Lisa Dickinson	Franklin, Tenn.
17	Rick Dickinson	Franklin, Tenn.
18	Durland B. Eakin	Franklin, Tenn.
19	Gail Fails	
20	Douglas Fisher	Franklin, Tenn.
21	The Honorable Bill Frist, U.S. Senator	Nashville, Tenn.
22	Kathleen Galliger	
23	Barbara Gershowitz	Franklin, Tenn.
24	Stacy Gershowitz	Franklin, Tenn.
25	Tim Hestle	Franklin, Tenn.
26	Scott W. Holmes	Franklin, Tenn.
27	Peggy McLaughlin Horner	

Aspen Grove - Westhaven 161-kV Transmission Line

No.	Commenters	City and State
28	Dee Hudson	Franklin, Tenn.
29	Scott Hudson	Franklin, Tenn.
30	Garland C. Hunt, Sr.	
31	Jennifer Jackson	Franklin, Tenn.
32	Rick Jackson	Franklin, Tenn.
33	Andy Koepke	
34	Kevin Lamb	Franklin, Tenn.
35	Linda Lamb	Franklin, Tenn.
36	Susan Littleton	
37	Jeff Matyas	Franklin, Tenn.
38	Kathy Matyas	Franklin, Tenn.
39	Susan Matyas	Franklin, Tenn.
40	George McLaughlin	Franklin, Tenn.
41	Linda McLaughlin	Franklin, Tenn.
42	Agnes Fort More	Franklin, Tenn.
43	Ellen L. More	Franklin, Tenn.
44	John Morris	Franklin, Tenn.
45	Tonya Morris	Franklin, Tenn.
46	Joyce A. Mosier	Franklin, Tenn.
47	Leslie H. Mosier	Franklin, Tenn.
48	Craig Parker	
49	Mary Pearce, Heritage Foundation of Franklin and Williamson County	
50	Bryon Pickard	Franklin, Tenn.
51	Dennie Pickard	Franklin, Tenn.
52	Jim Presswood, Southern Alliance for Clean Energy	Atlanta, Ga.
53	A. Bruce Reynolds	
54	Carol J. Richter	Franklin, Tenn.
55	Maurice R. Richter	Franklin, Tenn.
56	Robert Rogers	Murfreesboro, Tenn.
57	Rory B. Rowan	Franklin, Tenn.
58	Jim Schumacher	Franklin, Tenn.
59	The Honorable Jerry Sharber, Mayor of the City of Franklin	Franklin, Tenn.
60	Alan Sherwood	Franklin, Tenn.
61	Michelle Sherwood	Franklin, Tenn.
62	Renee Smith	
63	Shannon Smith	Franklin, Tenn.
64	Southern Land Company	Franklin, Tenn.
65	Brenda Stout	Franklin, Tenn.
66	Eric P. Stout	Franklin, Tenn.
67	Marie Swinford	Franklin, Tenn.
68	Deborah Wilson	Franklin, Tenn.
69	John Wilson	Franklin, Tenn.
70	Paul Wilson	Franklin, Tenn.
71	Karen Woodliff	Franklin, Tenn.
72	Tommy Woodliff	Franklin, Tenn.
73	Amy Wylie	Franklin, Tenn.
74	Steve Wylie	Franklin, Tenn.
75	David Yates	Franklin, Tenn.
76	Tom Zazzi	Franklin, Tenn.

## List of Public Meeting Attendees

No.	Attendee	City, State
1	Jim Alcott	Franklin, Tenn.
2	Robert Anderton	Franklin, Tenn.
3	The Honorable Ernie Bacon, Alderman of the City of Franklin	Franklin, Tenn.
4	Anne Laine Bagwell	Franklin, Tenn.
5	Becky Barkley	Franklin, Tenn.
6	Bill Barkley	Franklin, Tenn.
7	The Honorable Bob Barnwell, Commissioner of Williamson County	Franklin, Tenn.
8	Robert Bolen	Franklin, Tenn.
9	Dorie Bolze, Harpeth River Watershed Association	Franklin, Tenn.
10	The Honorable Mary Brockman, Commissioner of Williamson County, 9th District	Franklin, Tenn.
11	Pled Duncan Callicott	Franklin, Tenn.
12	James Carbine	Franklin, Tenn.
13	Carol Chapman	Franklin, Tenn.
14	Joe Chapman	Franklin, Tenn.
15	Elbert & Deborah Cox	Franklin, Tenn.
16	Elmer Cox	Franklin, Tenn.
17	Debbie Craig	Nashville, Tenn.
18	Dylan Crouch	Franklin, Tenn.
19	Joseph G. Dono	Franklin, Tenn.
20	Mary M. Dono	Franklin, Tenn.
21	Mr. & Mrs. James W. Drury, Sr.	Franklin, Tenn.
22	The Honorable Chuck Edmondson & Mrs. Edmondson, Alderman of the City of Franklin	Franklin, Tenn.
23	Bryan Echols	Nashville, Tenn.
24	The Honorable Tom Feuerborn, Alderman of the City of Franklin	Franklin, Tenn.
25	Jeff Ford	Brentwood, Tenn.
26	Tomlinson Fort	Franklin, Tenn.
27	Ida Galehouse	Franklin, Tenn.
28	Angela Geadelmann	Franklin, Tenn.
29	Eric Geadelmann	Franklin, Tenn.
30	John Griffith	Franklin, Tenn.
31	Traci Hannah	Franklin, Tenn.
32	Tim Hestle	Franklin, Tenn.
33	Gayle Kennedy	Franklin, Tenn.
34	Lee Kennedy	Franklin, Tenn.
35	Lynlee Kennedy	Franklin, Tenn.
36	The Honorable Dan Klatt, Alderman of the City of Franklin	Franklin, Tenn.
37	Charles Laine	Franklin, Tenn.
38	Doris Laine	Franklin, Tenn.
39	Porter Langfilit, Langfilit & Associates	Franklin, Tenn.
40	Jeff Lawrence	Franklin, Tenn.
41	Lindy Lawrence	Franklin, Tenn.
42	Robanne Legar	Franklin, Tenn.
43	Boyce Magli	Franklin, Tenn.
44	Melissa Miller, Special Assistant to U.S. Representative Marsha Blackburn	Franklin, Tenn.
45	Susan Minor	Franklin, Tenn.

Aspen Grove - Westhaven 161-kV Transmission Line

No.	Attendee	City, State
46	Mr. & Mrs. Livingfield More	Franklin, Tenn.
47	William Morgan	Franklin, Tenn.
48	Scott Morrison, Southern Land Company	Bethesda, Md.
49	Dean Moyer	Franklin, Tenn.
50	Tom Muller, City of Franklin Alderman	Franklin, Tenn.
51	The Honorable Houston Naron, Chairman, Williamson County Commission	Franklin, Tenn.
52	Michelle Neece	Franklin, Tenn.
53	John Noel, Southern Alliance for Clean Energy	Nashville, Tenn.
54	Bill Ormes	Franklin, Tenn.
55	Khris Pascarella	Franklin, Tenn.
56	Paul Pearre & Family	Franklin, Tenn.
57	Bryon Pickard	Franklin, Tenn.
58	Dennie Pickard	Franklin, Tenn.
59	John Quinnan	Nashville, Tenn.
60	Ed Rainey	Franklin, Tenn.
61	Owen & Ruth Reese	Franklin, Tenn.
62	Susan Reynolds	Franklin, Tenn.
63	Tim Riche	Franklin, Tenn.
64	Carol J. Richter	Franklin, Tenn.
65	Maurice R. Richter	Franklin, Tenn.
66	Jon Rose	Nashville, Tenn.
67	Rory B. Rowan	Franklin, Tenn.
68	The Honorable Charles M. Sargent, Jr., Tennessee House of Representatives	Franklin, Tenn.
69	Mary Schumacher	Franklin, Tenn.
70	Jim & Linda Scott	Franklin, Tenn.
71	The Honorable Jerry Sharber, Mayor of the City of Franklin	Franklin, Tenn.
72	Tom Shell	Franklin, Tenn.
73	Alan Sherwood	Franklin, Tenn.
74	Jesse Short	Franklin, Tenn.
75	Angela Stinson	Nashville, Tenn.
76	Cindy Tumblin	Franklin, Tenn.
77	Mike Walton, Harpeth River Watershed Association	Franklin, Tenn.
78	Mary Anne & Jim Warren	Brentwood, Tenn.
79	Fred Webber	Nashville, Tenn.
80	Mike Woodall	Franklin, Tenn.
81	Brenda Zazzi	Franklin, Tenn.
82	Tom Zazzi	Franklin, Tenn.

### Comments supporting Option Corridor A

1. *All of the parties affected by the power lines construction and completion are in favor of the Option Corridor A, including the City of Franklin, Williamson County Residents and land owners including the new Westhaven development, the Heritage Foundation, and The Harpeth River Association. Commenters: Randy Bates, Ann F. Bell, Mary Brockman, Kim Cantrell, Elmer Cox, Tina DeLoach, Lisa Dickinson, Rick Dickinson, Joseph G. Dono, Mary M. Dono, Angela Geadelmann, Eric Geadelmann, Barbara Gershowitz, Stacy Gershowitz, Tracy Hannah, Scott W. Holmes, Garland C. Hunt, Sr., Andy Koepke, Jeff Matyas, Kathy Matyas, Susan Matyas, Agnes Fort More, Livingfield More, Joyce A. Mosier, Leslie H. Mosier, George H. Nolan, Bryon Pickard, Dennie Pickard, Carol J. Richter, Maurice R. Richter, Rory B. Rowan, Mary Schumacher, Alan Sherwood, Michelle Sherwood, Brenda Stout, Eric P. Stout, Marie Swinford, John Wilson, Mike Woodall, Tom Zazzi*
2. *I would like to express my desire for TVA to select Option Corridor A which is the least disruptive route. This is the route which most people in Franklin and Williamson County are supporting. Why was Option Corridor B even brought up? Commenter: David Bryant*
3. *The use of Option Corridor A would result in the installation being hidden from the view of many taxpayers and property owners who live in the picturesque part of the county threatened by Option Corridor B. Commenters: Garland C. Hunt, Sr., Livingfield More, Rory B. Rowan, Brenda Stout, Eric P. Stout*
4. *Let the record be known that I fully endorse Option Corridor A and oppose Option B. Commenter: Jim Schumacher*
5. *We support Option A. Commenter: Robert Rogers, Ph.D*
6. *I am writing to ask that TVA please use Option Corridor A so that lands will be preserved for people to enjoy. Commenter: Paula Covington*
7. *It is my understanding that Option Corridor A would utilize right-of-way that is largely already owned by TVA...I respectfully request that you assist residents of this area in determining that the final decision of this high-voltage line be located in accordance with Option Corridor A. Commenter: Durland B. Eakin*
8. *Limit the transmission line route to Option A corridor. Commenters: Board of Mayor and Aldermen of the City of Franklin*
9. *I am writing to voice my opinion regarding the proposed Bingham Substation Transmission Line and to encourage TVA to elect to use Option Corridor A. Commenters: Barbara Cragg, Ellen Livingfield More*

10. *I strongly urge TVA to revisit Route A as far as the route. I talked with Roger Sparry tonight, who tells me he is the Senior Representative from TVA, and I suggested to him that he consult with the Mayor of our city to arrange for a special meeting of our Board of Mayor and Aldermen for him, for Mr. Sparry and his TVA staff, to bring their technical people to explain to the city of Franklin again why Route A is not technically feasible. Commenter: Ernie Bacon*
11. *The City of Franklin Mayor and Aldermen passed a resolution this week condemning the TVA preferred route ("Corridor B"), supporting only the "Corridor A" option. Representatives from the Heritage Foundation, the Harpeth River Water Shed Association, and the new Westhaven development are also in support of "Corridor A". The need for additional power in the area is due in part to the Westhaven development. I request that you review my concerns and support the views of the community. Hopefully, your influence will help TVA realize that "Corridor A" is the best option. Commenters: Tim Hestle, Dee Hudson, Scott Hudson, Jennifer Jackson, Rick Jackson, Kevin Lamb, Linda Lamb, George McLaughlin, Linda McLaughlin, John Morris, Tonya Morris, Deborah Wilson, Paul Wilson, Karen Woodliff, Tommy Woodliff, Amy Wylie, Steve Wylie*
12. *TVA's own report scored Option Corridor A as the best route, even though they are pushing Option Corridor B (page 17 of report). Commenters: Randy Bates, Ann F. Bell, David Bryant, Kim Cantrell, Tina DeLoach, Barbara Gershowitz, Stacy Gershowitz, Garland C. Hunt, Sr., Andy Koepke, Jeff Matyas, Kathy Matyas, Susan Matyas, Livingfield More, Joyce A. Mosier, Leslie H. Mosier, Bryon Pickard, Dennie Pickard, Carol J. Richter, Maurice R. Richter, Rory B. Rowan, Alan Sherwood, Michelle Sherwood, Brenda Stout, Eric P. Stout, Marie Swinford, John Wilson, Tom Zazzi*
13. *TVA's own report identified Option Corridor A as being the most logical route. I cannot imagine why they are now considering another route at this late date. Commenter: Durland B. Eakin*
14. *Can you explain the rationale behind considering Option Corridor B when Option Corridor A ranks as the optimal route on TVA's grading scale? Commenter: David DeLoach*
15. *A recent urban growth study conducted by the City of Franklin and Williamson County residents preferred Option Corridor A. Commenters: Randy Bates, Ann F. Bell, Tina DeLoach, Lisa Dickinson, Rick Dickinson, Durland B. Eakin, Barbara Gershowitz, Stacy Gershowitz, Scott W. Holmes, Garland C. Hunt, Sr., Jeff Matyas, Kathy Matyas, Susan Matyas, Joyce A. Mosier, Leslie H. Mosier, Bryon Pickard, Dennie Pickard, Carol J. Richter, Maurice R. Richter, Rory B. Rowan, Alan Sherwood, Michelle Sherwood, Brenda Stout, Eric P. Stout, John Wilson*
16. *Costly delays in project start up due to litigation could be avoided if Option Corridor A is selected. Commenters: Garland C. Hunt, Sr., Rory B. Rowan, Eric P. Stout, John Wilson*
17. *Choosing Option A would avoid delays in the construction due to litigation and public protest. Commenter: Marie Swinford*

**Response to Comments 1-17:** See Section 2.5.5, Establish and Apply Siting Criteria, and Section 2.5.6, Identify Preferred Option, for details regarding the process and reasons for identifying Option B as TVA's preferred option.

18. *Option Corridor A was the most logical route in open house meetings on June 13, 14, and 15 of 2000. Due to inaction/poor planning, putting a power line through a valuable, historic and pristine area to save a little time is not acceptable.*

Commenters: Randy Bates, Ann F. Bell, Tina DeLoach, Barbara Gershowitz, Stacy Gershowitz, Scott W. Holmes, Garland C. Hunt, Sr., Andy Koepke, Jeff Matyas, Kathy Matyas, Susan Matyas, Joyce A. Mosier, Leslie H. Mosier, Carol J. Richter, Maurice R. Richter, Rory B. Rowan, Jim Schumacher, Alan Sherwood, Michelle Sherwood, Brenda Stout, Eric P. Stout, John Wilson

19. *In short, Option Corridor A was the most reasonable route discussed in open house meetings on 6/13, 6/14, and 6/15 of 2000, but it appears that TVA is pushing for the least desirable route and one can only speculate as to why! Commenters: Bryon Pickard, Dennie Pickard*

**Response to Comments 18 and 19:** At the time that the 2000 open houses were held, no preferred route had been selected. See response to Comments 1-17.

20. *Option Corridor A would be "conducive to long range plans," as noted in TVA's draft environmental assessment. Commenter: George H. Nolan*

**Response:** TVA's long-range plans are constantly being updated as situations and trends change and additional information is gathered. At present, the plans for this area include no definite scenario for which use of Corridor A would offer any advantage.

**Why is TVA not using existing rights-of-way on either Option Corridor A or Hwy 96?**

21. *Instead of crossing existing subdivisions of Old Franklin, TVA should stick with existing ROW on Hwy 96W. The sole purpose is to provide power to West Haven, so let them deal with the eye sore and danger. Commenter: Tim Riche*
22. *Or, failing that, to at least install the new lines along the path of existing lines down Hwy 96 West and out Old Hillsboro Rd. Commenter: Louise C. Cline*
23. *Why use private property when existing right-of-ways should be sufficient? Highway 96W has existing power poles and lines. Also, the route is shorter. Commenter: Anne Bagwell*
24. *A more suitable route would be down Hwy 96 where there are already power lines, or along Del Rio Pike, near Carlisle Lane (alternate route, segment A). Commenter: Tom Zazzi*
25. *Please use Alternative Route Segment A or along Highway 96 as the route for the Aspen Grove-Bingham Transmission Line. Commenters: Bryon Pickard, Dennie Pickard*

26. *This line should follow 96 Highway or Del Rio Pike. There is no reason to cross beautiful farmland. Poles are already along the highway, and additional poles of greater height will not be noticeable.* Commenter: Charles E. Laine, Doris A. Laine
27. *We live in the county, and they say the new power line is for neighborhoods to be built in the city that are going to require the power. We are wondering why they just are pushing it off into the county and not using the city lines. Or it just seems real obvious they already have power lines on Highway 96. Why not just go down 96? Or if they can't do that, they ought to keep it as close to Del Rio Pike as they can, not to disturb farmland that's in the county. That is what I don't understand. And I don't think we are getting – the county has no representation. And the city is putting their wishes on us and we don't – that's not what we want.* Commenter: Brenda Zazzi
28. *Why would it not be preferable to use existing corridors that already have lines, rather than scarring additional landscape in yet another beautiful area?* Commenter: Paula Covington
29. *It seems to make more sense to locate them where a right-of-way currently exists as was done on Mack Hatcher at Cool Springs.* Commenter: Ed Rainey
30. *The TVA already owns a right-of-way through less vulnerable land that can be made viable for the location of this line.* Commenter: Agnes Fort More
31. *It is my understanding that Option Corridor A would utilize right-of-way that is largely already owned by TVA.* Commenter: Durland B. Eakin
32. *If I understand correctly, the TVA already owns a right-of-way [Option Corridor A] in rural Williamson County which would be the optimal routes for these new lines to take (according to TVA's grading system).* Commenter: David DeLoach
33. *The last beautiful parts to Franklin need to be spared since there is already an infrastructure in place.* Commenter: Garth Fails
34. *Option Corridor A is acceptable/preferable because it would utilize an existing TVA right of way.* Commenters: Barbara Cragg, Ellen Livingfield More
35. *TVA's original plan was to use what is now called "Corridor A". It runs in their existing power line right of way from Nashville/Davidson County to Franklin/Williamson County. This route would have the least impact to the area.* Commenters: Tim Hestle, Dee Hudson, Scott Hudson, Jennifer Jackson, Rick Jackson, Kevin Lamb, Linda Lamb, George McLaughlin, Linda McLaughlin, John Morris, Tonya Morris, Deborah Wilson, Paul Wilson, Karen Woodliff, Tommy Woodliff, Amy Wylie, Steve Wylie
36. *The TVA already has a Right of Way through Option Corridor A.* Commenters: Rory B. Rowan, Brenda Stout, Eric P. Stout
37. *Under Option Corridor A, the new power line would travel through rural Williamson County using existing right-of-way already owned by the TVA. It makes all the sense in the world.* Commenter: Scott W. Holmes

38. *Option A travels south through rural Williamson County using existing right-of-way already owned by TVA. It least impacts all parties involved while preserving quality of life for area residents whose future is invested in a peaceful rural setting unmarred by power lines. Commenters: Joyce A. Mosier, Leslie H. Mosier*
39. *Corridor A route would utilize existing TVA rights of way with improved infrastructure. Commenters: Barbara Gershowitz, Stacy Gershowitz*
40. *The TVA already has a Right of Way through Option Corridor A. Commenters: Garland C. Hunt, Sr., Marie Swinford*
41. *I strongly urge TVA to select the Corridor A Route, the route traveling from southern Davidson County through rural Williamson County using primarily existing right-of-way. Commenter: John Wilson*
42. *TVA has several options available to it for the routing of the power line. One of those options, "Option Corridor A," would involve tracking the same route as an existing power line. Under Option Corridor A, the existing transmission line structures would be replaced with new structures that would support both the existing (500 kV) circuit and the new (161 kV) circuit. TVA would need to secure very little additional right of way for Option Corridor A. Commenter: George H. Nolan*
43. *The Tennessee Valley Authority already has a Right of Way through Option Corridor A. Commenter: Livingfield More*

**Response to Comments 21-43:** See the routing discussion in Section 2.5, Project and Siting Alternatives, of the EA and the response to Comments 1-17.

#### **Comments regarding the number of river crossings**

44. *The environmental effects of crossing the Harpeth River seven times and the consequent detrimental effect of limited vegetation will cause severe erosion of the banks on an already stressed river. Commenters: Randy Bates, Ann F. Bell, Tina DeLoach, Barbara Gershowitz, Stacy Gershowitz, Scott W. Holmes, Garland C. Hunt, Sr., Joyce A. Mosier, Leslie H. Mosier, Carol J. Richter, Maurice R. Richter, Rory B. Rowan, Jim Schumacher, Alan Sherwood, Michelle Sherwood, Brenda Stout, Eric P. Stout, Marie Swinford, John Wilson*
45. *My house sits roughly 100 yards from the West Harpeth. In recent weeks we have seen massive flooding across our land and threatening our house. My concern is that the clear cutting required for the transmission line, that I to cross my property, will increase erosion and soil stability, and causing even greater flooding of my land. I feel the environmental impact and the possibility of alternate routes have not been studied thoroughly. Commenter: Lee Kennedy*
46. *The portion of land which will remain after this taking will have been diminished and damaged in every sense: environmentally, ecologically. . . . Commenter: Agnes Fort More*
47. *I have grave concerns that the proposed path of the power line will cause erosion to the banks of the West Harpeth River, which would pose a serious threat to a*

*significant portion of my property. I feel that, at the very least, I deserve assurances that if this line, as currently planned, is the only possible option for TVA and MTEMC that every effort will be made to fully restore the areas disrupted by its installation.*

Commenter: Louise C. Cline

48. *In Williamson County, power lines near the river's edge have caused damage to the integrity of the riverbanks. Commenter: Mary Pearce*
49. *Concerns about the environmental effects of crossing the Harpeth River a potential of seven times and how this will affect limited vegetation and erosion of the banks on a river that already overflows its banks with heavy rainfall. Commenters: Bryon Pickard, Dennie Pickard*
50. *The Harpeth River (lifeblood of the city) will be environmentally impacted at all points where your lines would cross. Commenter: Andy Koepke*
51. *Option Corridor B would have a negative effect ecologically in the Harpeth River areas it would cross. Commenter: Joseph G. Dono, Mary M. Dono, Angela Gadelmann, Eric Gadelmann*
52. *TVA would need to secure very little additional right of way for Option Corridor A. No new river crossings would be made. No scenic views would be disturbed. Option Corridor B will . . . require new river crossings. Commenter: George H. Nolan*
53. *The Harpeth River would be spared the environmental and aesthetic damage occasioned by the numerous crossings necessitated by the current Preferred Route. Commenter: Livingfield More*
54. *My concern is the crossing of the West Harpeth River in two places within several hundred yards of each other east – in an easterly direction from the Cool Springs Substation as it approaches Highway 96 near the intersection of Highway 46. But the two 100-foot-wide swath within such a close proximity is regrettable, and hopefully the Tennessee Valley Authority and the Middle Tennessee Electric will reconsider that particular double crossing as it pertains to the Glasses Bridge. Commenter: Pled Duncan Callicott*
55. *The thing that I'm most disappointed in is TVA's decision to cross the Harpeth so many times. We worked very, very diligently in this area to try to clean up the Harpeth. The damage that will result in this, not possibly, but will result in this, is a detriment to our community. There are alternatives that they can look at. If they will check the records, Williamson County has been very diligent in working with the EPA to get the water cleaned up. The builders in this area are working with the government agencies in providing lots of open space around the river without building next to the river or even close to it. All of the development where there is runoff has worked with the county agencies. I've been really, really disappointed because TVA is – they depend on our water, and we have such beautiful natural resources here, but it's quickly diminishing because of some of the things the Highway Department was doing. I just expected better out of TVA. They depend on the water, and we depend on the water. And every bit of siltation and debris and pollution that we put in it is a detriment. Commenter: Deborah Cox*

56. *And, again, the pollution of the river, we feel, is very – is going to be very detrimental, because I have seen in the two TVA crossings in Normandy Lake in Coffee County on heavy rainfalls, there is a large amount of wooded debris that falls into the lake, and if this happens in the Harpeth River, then all of the work that the citizens have done to remove downed trees and other obstructions to control flooding is just going to reoccur again. And there is going to be a large amount of flooding, not only in residential areas, but also in the city of Franklin. Commenter: Elmer Cox*
57. *The Harpeth River watershed is largely impaired. The transmission lines such as the TVA builds causes extensive riverbank erosion due to defoliation on the right-of-way. This proposed route is inappropriate in my opinion. Commenter: Robert Bolen*
58. *And we're not quite so worried about this except for the flooding that we've experienced on our property over the last few weeks, and that we did get trapped into the property and did not have a way to leave. It went – the water went over the road, and when my son tried to go through it, it messed up the radiator on his truck. I'm worried about the river changing and more water spilling over on our property because it is on the low side of the river and that is the way that it floods. Commenter: Gayle Kennedy*

**Response to Comments 44-58:** In consideration of these and other concerns expressed during the public review process, TVA and MTEMC have reconsidered their respective actions. MTEMC has decided to site their planned substation near the western city limits of Franklin and Westhaven Subdivision development (see Figure 2-2). By relocating the site of the substation, TVA is now able to identify a shorter transmission line route and eliminate the five West Harpeth River crossings that would have been necessary with TVA's preferred route to serve a substation at Bingham. In addition, TVA developed an erosion control plan to stabilize the streambank at the Harpeth River crossing locations (Appendix X). The Harpeth River Watershed Association has provided comments and is in agreement with the development of these plans. For additional details, see the sections on Surface Water and Aquatic Ecology in Chapters 3 and 4 (Sections 3.4, 3.9, 4.4, and 4.9).

#### **Option Corridor B will affect the historic district and historic sites**

59. *The preferred route by TVA cuts through the proposed Harpeth River Historic District and encroaches on at least seven historic site buffer zones. Commenters: Randy Bates, Ann F. Bell, Tina DeLoach, Lisa Dickinson, Rick Dickinson, Barbara Gershowitz, Stacy Gershowitz, Scott W. Holmes, Garland C. Hunt, Sr., Jeff Matyas, Kathy Matyas, Susan Matyas, Joyce A. Mosier, Leslie H. Mosier, Bryon Pickard, Dennie Pickard, Carol J. Richter, Maurice R. Richter, Rory B. Rowan, Jim Schumacher, Alan Sherwood, Michelle Sherwood, Brenda Stout, Eric P. Stout, Marie Swinford, John Wilson, Tom Zazzi*
60. *The portion of land which will remain after this taking will have been diminished and damaged in every sense: . . . historically . . . Commenter: Agnes Fort More*
61. *Option Corridor B will have a detrimental impact on seven historic site buffer zones and on the proposed Harpeth River Historic District. Commenter: Durland B. Eakin*

62. *Williamson County is fortunate in that some old, beautiful and highly prized antebellum homes have been preserved in a rural setting. When Middle Tennesseans think of Franklin and of Williamson County, they think of the dramatic events here in the War Between the States. Historic preservation, many would agree, is the chief local interest of many people. With respect to the 161-kV Aspen Grove-Bingham TVA Transmission Line, there is a lot of talk here and a lot of concern about where it will be located. For whatever it may be worth to you to know, a host of people concerned with preservation issues are hoping for the choice of what is understood to be your "Route A" which would leave these old special homes and their approaches undisturbed and unmarred. Commenter: Douglas Fisher*
63. *Although no route to our knowledge has been selected, the Heritage Foundation finds that all routes will have an adverse effect on historic resources. The Tennessee Historical Commission reports that the project area also contains archeological sites eligible for the National Register of Historic Places that could be adversely affected by the transmission line. This is one of two rural areas in Williamson County that has been determined eligible for National Register of Historic Places. The other is Leiper's Fork Historic District. The proposed mitigation of impact to historic resources is minimal at best. (Single poles painted "Franklin green"). Commenter: Mary Pearce*
64. *. . . I am strongly opposed to Corridor B, due to . . . compromises historical buffer zones . . . . Commenter: David Bryant*
65. *Option Corridor B would have a negative effect . . . as well as a detrimental effect on the historic preservation areas nearby . . . . Commenters: Joseph G. Dono, Mary M. Dono, Angela Geadelmann, Eric Geadelmann*
66. *The route being proposed cuts through the Harpeth River Valley Historic District which will definitely be adversely impacted. Commenter: Mary Brockman*
67. *Option Corridor B will . . .invade historical areas. Commenter: George H. Nolan*
68. *I think they should re-look into the historical site which is just proposed. Commenter: Mary Schumacher*
69. *This property has aesthetic value that would be jeopardized by the transection of high tension power lines. The construction and maintenance of such lines would interfere with the quality of life of those that this historic farm serves. Commenter: Peggy McLaughlin Horner*

**Response to Comments 59-69:** TVA has worked closely with the Tennessee State Historical Commission in an effort to minimize potential impacts to historic resources. TVA and the state have developed a Memorandum of Agreement, which, in the opinion of both, will result in minimal and insignificant impact to these resources (Section 4.3.11, Cultural Resources, and Appendix II - Correspondence and Public Comments).

### **The transmission line will affect the value of my property**

70. *The adverse impact of high voltage lines crossing exceptionally valuable property. A considerable segment of the lines pass near Whitehall Farms, a new seventy home community with underground utilities and home values from \$400,000+. The end result impacting the environment of many residents negatively and devastating property values in the area. Commenters: Randy Bates, Ann F. Bell, Tina DeLoach, Lisa Dickinson, Rick Dickinson, Barbara Gershowitz, Stacy Gershowitz, Scott W. Holmes, Garland C. Hunt, Sr., Jeff Matyas, Kathy Matyas, Susan Matyas, Joyce A. Mosier, Leslie H. Mosier, Carol J. Richter, Maurice R. Richter, Rory B. Rowan, Jim Schumacher, Alan Sherwood, Michelle Sherwood, Brenda Stout, Eric P. Stout, John Wilson*
71. *I'm sure TVA is interested in providing clean, safe and low-cost power to its customers. I would also hope that TVA is concerned about the value of its customers' home values when it is affected by TVA's future plans. Commenter: Randy Bates*
72. *We are adamantly opposed to proposed Option B, which would have devastating consequences for our farm. Commenter: Robert Rogers, Ph. D*
73. *Not only will this remove the aesthetic buffer between the homes and Highway 96 but will negatively affect our property value. Commenter: Susan Littleton*
74. *Option B would destroy beautiful land as well as the value of adjacent land. Commenter: Paula Covington*
75. *The portion of land which will remain after this taking will have been diminished and damaged in every sense: . . . financially . . . . Commenter: Agnes Fort More*
76. *A segment of Option Corridor B will pass very near Whitehall Farms Subdivision which made the expenditure to install underground utilities. It seems unthinkable to make this expenditure a waste by installing a high voltage line almost abutting the length of the subdivision for no apparent benefit to taxpayers. Commenter: Durland B. Eakin*
77. *Aside from the significant adverse impact it would have on the historic, environmental, cultural, economic, and aesthetic values of Franklin and the county, it also has a highly detrimental impact on property values of the residents in its path or proximity. Commenter: A. Bruce Reynolds*
78. *It directly affects our property value. Commenter: Anne Bagwell*
79. *Option B is bad because it is unfair to current landowners and their heirs because it amounts to a taking of the actual land necessary for these lines, and it also destroys the value of the adjacent/remaining land. Commenters: Barbara Cragg, Ellen Livingfield More*
80. *It is hard to understand why the TVA is purposing this plan which will completely the value of the homes in Whitehall Farms and directly affect the value of my home . . . . Commenter: Michelle Neece*

81. *My wife and I have recently built a new house in the Whitehall Farms Subdivision. There are approximately 70 lots, with a minimum lot size of one acre. We have underground utilities, and the houses in this development are \$400,000 and up. This is a huge investment we cannot afford to lose. Commenters: Tim Hestle, Dee Hudson, Scott Hudson, Jennifer Jackson, Rick Jackson, Kevin Lamb, Linda Lamb, George McLaughlin, Linda McLaughlin, John Morris, Tonya Morris, Deborah Wilson, Paul Wilson, Karen Woodliff, Tommy Woodliff, Amy Wylie, Steve Wylie*
82. *And we, the neighborhood I live in, is a – has underground utilities. The houses cost a half-million dollars, and it's a new development. And they're putting high-voltage power lines in my neighborhood in eyesight of them. Commenter: Rory Rowan*
83. *The reason that I am opposed to that is because we live in a subdivision currently that has underground wiring. Everything is underground. We would not have bought in that subdivision if it was not underground. And number two, our home values will depreciate by at least – my estimate is 25 percent. So, therefore, that's why – myself – we're opposed to B and we want Segment A running farther south from our homes so it doesn't put us in a situation where we lose value of our homes. Commenter: Maurice R. Richter *The proposed TVA line is too close to our neighborhood & must be placed along the farthest southern route so it will not drop the value of our homes.* Commenters: Carol J. Richter, Maurice R. Richter*
84. *It's going to drop my property value. Commenter: Alan Sherwood*
85. *And most important to us is the fact that power lines could pass near Whitehall Farms Subdivision (where we live) and can have a severe negative impact on property values as well as the quality of life with noise, air and land pollution. Commenters: Bryon Pickard, Dennie Pickard*
86. *We moved here because Brentwood did not have the "country feeling" that we were looking for; we had become tired of traffic noises overpowering the sounds of nature. We found Whitehall Farms . . . it gave us the quiet of the country, still close enough to the city. It didn't matter to us that we would have to drive fifteen minutes to reach the interstate. We invested in this community, one with underground utilities, to give us unobstructed views and an area to protect our investment with other homes of over \$400,000. Two years after this investment, we find that the city is now going to take our investment away by placing power lines and roads within 1800 feet of the main entrance to our subdivision. Commenters: Jeff Matyas, Kathy Matyas, Susan Matyas*
87. *I am strongly opposed to Corridor B, due to . . . detrimental effect on land values. Commenter: David Bryant*
88. *Option Corridor B would have a . . . negative economic effect on the subdivision in which I live. Commenters: Joseph G. Dono, Mary M. Dono, Angela Geadelmann, Eric Geadelmann*
89. *This would have a negative impact on fewer people and property values, not to mention quality of life. Commenter: Ed Rainey*
90. *The demise of the Crown Option contract clearly demonstrates that the selection of Option Corridor B will reduce the value of the More property by millions of dollars. In*

*addition, the TVA Aspen Grove-Bingham 161 kV Transmission Line Project, and the protracted decision-making process surrounding it, has placed an enormous cloud over the More Farm. TVA is effectively preventing Mr. More from exercising his legal right to sell his land for its fair market value. Option Corridor B will displace residents, prevent proposed new developments . . . lower property values, causing untold millions of dollars in economic damage to numerous area landowners, including Mr. More. Commenter: George H. Nolan*

91. *Should Option Corridor A be used, a Right of Way would not have to be acquired in an area having extremely high property values as is the case in the Preferred Route. The unfortunate impact of a high voltage power line crossing very valuable property and affecting the environment of many residents in a negative way would be avoided—property values would not be destroyed. Commenter: Livingfield More*
92. *I am directly next door to the proposed Bingham Substation site, so it will directly impact my home, directly impact the values of my property. Commenter: Susan Reynolds*

**Response to Comments 70-92:** See the response to Comments 44-58. As a result of public comments and concerns, MTEMC decided to change the location of its planned substation. This allows TVA to substantially shorten the proposed transmission line that is needed to serve the substation. This substantially reduces the number of property owners potentially affected. The impact of the transmission line right-of-way on the value of impacted properties will be considered in the appraisal of easement rights that would be acquired by TVA.

#### **Why is TVA not following TDOT's planned Mack Hatcher Parkway?**

93. *T-DOT will soon decide on a route for the extension of the Mack Hatcher By-Pass. It is the understanding of the Heritage Foundation that TVA considers the need for the power line too critical to consider locating infrastructure along the same route as the roadway. This means that the location of the transmission line may cause increased negative visual impact to the open fields of this historic area unless Route A is selected which will cross the Natchez Trace Parkway once. Commenter: Mary Pearce*
94. *No route 'B'! It makes no sense to not follow the Mack Hatcher extension. Commenter: John Griffith*
95. *That southern route is next to the Alternate Route Segment A that TDOT is recommending. Commenters: Carol J. Richter, Maurice R. Richter*
96. *Mr. More also strongly encourages TVA to coordinate its efforts with the Tennessee Department and Transportation ("TDOT"). As you know, TDOT is presently planning to extend Mack Hatcher Parkway, and that road project will likely affect the More farm. Any TVA right of way or easement should be adjacent to the planned Mack Hatcher Parkway extension. Nevertheless, TVA and TDOT do not appear to be coordinating their respective projects in order to minimize impacts upon landowners like Mr. More. Commenter: George H. Nolan*

**Response to Comments 93-96:** TVA and TDOT have worked together closely in an effort to coordinate respective route alignments as much as possible. Given the current status of TDOT's location process, TVA has identified a preferred route that is compatible and shares a common portion of TDOT's likely route.

**Comments concerning the safety risk of the transmission lines**

97. *It is hard to understand why the TVA is purposing this plan which will . . . directly affect . . . the safety of my children.* Commenter: Michelle Neece
98. *We feel if the Route B – Segment B, excuse me, is put into effect, the children's safety in the neighborhood will be at risk. We also have children in the area who will be at risk if your power lines are close to us.* Commenters: Carol J. Richter, Maurice R. Richter
99. *The construction of these lines is unacceptable due to the effects of magnetic radiation and high voltage induction on the Whitehall Farms Subdivision.* Commenter: Jim Schumacher
100. *According to doctors and statistics, they say that you are not even supposed to be close to those power lines because it can be hazardous to your health.* Commenter: Mary Schumacher

**Response to Comments 97-100:** See Section 4.4.1, Electric and Magnetic Fields.

**MTEMC's Bingham Substation selection process and why the substation is necessary**

101. *The lines and possible substation will be directly behind my house. Why can it not be moved further south, where no homes are affected?* Commenter: Michelle Neece
102. *To our knowledge there is no process to involve the community in a needs analysis for additional electrical infrastructure and if needed, the decision of where MTEMC will locate sub-stations. Then once the location of the sub-station is decided, options for the TVA transmission line or lines to the sub-station are not decided on in cooperation with other infrastructure planned for the same area. It has not been determined if the location of the Bingham sub-station is the appropriate location.* Commenter: Mary Pearce
103. *We also learned saw last week where you had earmarked a possible substation just to the south of Whitehall Drive. This would definitely reduce the value of our homes by at least 30% & you must be prepared to compensate our neighborhood in the event you were to build the substation there against our wishes and/or approval.* Commenters: Carol J. Richter, Maurice R. Richter
104. *I understand that there is going to be a large transformer unit that is going to be also close to or put on top of the existing lines that we already have. And I don't wish to look at that.* Commenter: Mary Schumacher

105. *I am directly next door to the proposed Bingham Substation site, so it will directly impact my home . . . . The real estate that they are planning to build the substation upon was not ever under debate by the public. It was never offered for debate by the public that this would be where a proposed substation would go. Middle Tennessee Electric had already purchased the land, and it was essentially announced to the public, "This is where we are going to put this proposed substation . . . abandon this location, relocate the substation closer to their actual need which is closer to Franklin proper and not run this six or eight miles or whatever it is out to the west of Franklin . . . . Yes, because one of the – one of the growth scenarios that they talk about in their documentation is the commercial and residential growth in the Bingham, the general Bingham area. And this is not where we can see that there is substantiation of growth. Commenter: Susan Reynolds*
106. *A young couple owned the land, Ricky and Mimi Hodges, and I believe it was H-O-D-G-E-S. They accepted a position with a new job out in the Carolinas. They sold the land to a woman in New York, and their understanding was that this was supposed to be a future, perhaps, vacation or country music home or whatever. Very shortly thereafter, this land was purchased by Middle Tennessee Electric without any knowledge on the neighbors' part. Surprise! Middle Tennessee Electric. Now, one would have to question, was the New York buyer always a ghost buyer? Was there ever really a woman that was going to build a vacation home on that land, or was it all something to get – Ricky and Mimi had denied a request on Middle Tennessee Electric's part to consider buying it. At least, that's what Mimi said after the fact. So, we as homeowners don't understand how they bought this thing. Commenter: Susan Reynolds*
107. *And, again, I think they can look at alternative placements of the substation as well as the – even though it may take a little bit longer and a little bit more money to use Plan A that they went with, it seems to me a more direct access. Commenter: Elmer Cox*
108. *My sense is that Middle Tennessee Electric bought some land in western Williamson County because it was available, and ever since, the TVA has been trying to figure out how to run the line to it. Commenter: Robert Bolen*
109. *TVA and MTEMC have thus far failed to prove a need for the new line. They have also not allowed appropriate public participation on the new route, which has been opposed by resolutions from both the city of Franklin and Williamson County. It would seem to me to be both more logical and cost effective to position a substation some 3 miles closer to Franklin at the proposed West Franklin site. Commenter: Louise C. Cline*
110. *After attending many meetings by the various groups affected including TVA and Middle Tennessee Electric Membership Corp., it is now obvious that the original reason for constructing the substation in its planned location is no longer valid. In fact, the reason never was valid. It is now obvious that the future power requirements of the area would be better served, with minimal impact to the concerned parties, if the substation was located on the newly noted site on the north side of Route 96 in Franklin. In fact, by locating the substation at this site, it would actually serve the area it's being constructed for and completely eliminate the current opposition. It's not too late to build the substation where it needs to be, not in the current location where there is absolutely no valid reason to put it. I trust the TVA will consider alternatives*

*to this line and engage Franklin and all other concerned parties to arrive at a successful conclusion to this issue, and not limit your thinking to the one MTEM C that just happens to own. Place the lines and substation to support the local needs where it needs to be. Commenter: A. Bruce Reynolds*

111. *Isn't the Cool Springs corridor the source of the greatest electric growth and is also the logical reason that Bingham is being linked to Aspen Grove? In order to understand and accept the burden of the station and lines, I would like to see exact language that defines the users being served. Commenter: Mary Brockman*

**Response to Comments 101-111:** MTEM C has repeatedly stated and justified the need for an additional source of power in the area west of the city of Franklin. Section 1.2 discusses this justification. Loads continue to grow, and the existing MTEM C capacity will be exceeded in the near future, forcing a moratorium on new electric service in this area. Construction of the new substation by MTEM C and the transmission line by TVA will address this problem. However, in light of these and other comments, MTEM C decided to change the location of the planned substation. This allows TVA to substantially shorten the proposed transmission line that is needed to serve the substation. MTEM C now plans to construct its substation near the western city limits of Franklin and Westhaven development (see Figure 2-2).

#### **Why can't you put the lines underground?**

112. *TVA would devastate one of the most beautiful valleys in middle Tennessee. Readjusting to existing right-of-ways would be much more desirable. Placing the lines underground should also be considered. Commenter: Fred Webber*
113. *The technology is out there, and other states are implementing it. I'm speaking about underground utility runs. Commenter: Renee Smith*
114. *What about the idea of the landowner donating the right-of-way for the power line as consideration for putting the line underground. Commenter: Livingfield More*
115. *...if they put Proposal B up, it goes right to my back door. And I do not wish to live underneath power lines. Right now, I have existing power lines. I'm paying extra for those lines to be underground, and I don't wish to have lines right by my back door because I already have it existing. Commenter: Mary Schumacher*

**Response to Comments 112-115:** Underground transmission line construction would have more environmental impacts than overhead transmission lines. Construction would require an excavated trench for the length of the transmission line, which increases the potential for erosion. The potential to impact other environmental concerns (i.e., plants, animals, wetlands) also increases when compared to the proposed method due to the amount of ground disturbance needed. Additionally, buried transmission lines would be closer to individuals passing near them and therefore, would not meet TVA's minimal continuous public exposure distance for EMF (see Section 4.4.1). Lastly, underground construction for transmission lines of this voltage is cost prohibitive, being as much as ten times more expensive than conventional overhead construction.

### Comments concerning transmission line crossing of the golf course

116. *At the very least, this transmission line will compromise the beauty of the golf course. At worst, this will prevent the golf course from being built in the first place.*

Commenter: Susan Littleton

117. *Why would you destroy a proposed golf course site by running your lines through it?*

Commenter: Andy Anderson

**Response to Comments 116 and 117:** In light of these and other comments, MTEMC decided to change the location of its planned substation. This allows TVA to substantially shorten the proposed transmission line that is needed to serve the substation. MTEMC now plans to construct its substation near the western city limits of Franklin and Westhaven development (see Figure 2-2). The new preferred transmission line route no longer crosses the proposed Westhaven Golf Course.

### General comments concerning the proposed transmission line

118. *We understand the need to supply power to the upcoming and existing communities; however, we are certain there are alternative methods to having such a large line and towers running through the communities. Surely, with all our advances in technology you can and most likely already have developed another solution to this problem. We urge you to find an alternative solution and implement it rather than impose your "quick fix" to supply power to those communities. Demonstrate your concern for the communities over your desire to solve the problem quickly and at less cost. The people it will affect are your customers and would definitely appreciate your regard for them.* Commenter: Craig Parker

**Response:** For alternatives considered, see Sections 2.2 and 2.3 of the EA. MTEMC's planned substation and the TVA transmission line to serve the substation are needed now because of the growth in demand that has already occurred. TVA has carefully analyzed alternative transmission line routes and has extensively coordinated its proposal with the public and other agencies over a multiyear period. As a result, both MTEMC and TVA have modified plans several times in their respective efforts to respond to the public. This cannot fairly be characterized as imposing a "quick fix."

119. *It is a tragedy that: 1) we could be denied our constitutionally assured property ownership rights; 2) we should be penalized by the "preferred route" for our diligence here; 3) our land stands to be "taken" and permanently scarred . . .* Commenter: Agnes Fort More

**Response:** Comment noted.

120. *The TVA preferred route seems to be the most desirable. It would have less adverse effect on the environment, communities, historic sites and would affect fewer homes and families.* Commenters: Carol Chapman, Joe Chapman

**Response:** Comment noted.

121. *Now, therefore, be it resolved, that the Board of Mayor and Aldermen of the City of Franklin urges TVA and MTEMC, as appropriate, to:*

- *Provide satisfactory evidence of the need for the Transmission Line;*
- *Limit the Transmission Line route to Option A corridor;*
- *Conduct a process in which the community, landowners and others impacted by the placement of the Transmission Line can participate to determine the most feasible route that would minimize the impacts on the values in the area;*
- *Engage in continuing, cooperative effort with government and private interests in Williamson County to develop and adopt programs that support energy efficiency, load management and distributed generation, reducing energy demand and thus mitigating the need for new utility infrastructure; and*
- *Be it further resolved that the City of Franklin calls on TVA and MTEMC to work with the public, commercial interests and officials of the City of Franklin, Williamson County and other government bodies in a meaningful public planning process for electrical infrastructure planning.*

Commenters: Board of Mayor and Aldermen of the City of Franklin

**Response:** Comments noted. See Chapter 2 of the EA for a general discussion of the issues raised by the comment. TVA and MTEMC have involved the public, commercial interests, and officials throughout the planning process for the proposed transmission line.

122. *Can you provide the details behind the decision-making process for the route in question?* Commenter: David DeLoach

**Response:** The decision-making process for the transmission line route is detailed in Section 2.5, Project and Siting Alternative.

123. *The need for additional power in the area is due in part to the Westhaven development.* Commenters: Tim Hestle, Dee Hudson, Scott Hudson, Jennifer Jackson, Rick Jackson, Kevin Lamb, Linda Lamb, George McLaughlin, Linda McLaughlin, John Morris, Tonya Morris, Deborah Wilson, Paul Wilson, Karen Woodliff, Tommy Woodliff, Amy Wylie, Steve Wylie,

**Response:** Comment noted.

124. *The need for the additional electrical infrastructure would seem to be much closer to the high growth areas of our community and not in this largely rural area where zoning and limited infrastructure will impede residential and commercial growth. The Heritage Foundation urges TVA and MTEMC to work with the Franklin community to plan for electrical needs through a process that is most protective of the historic, cultural and natural resources of this outstanding community.* Commenter: Mary Pearce

**Response:** See earlier responses addressing MTEMC's and TVA's efforts to respond to public suggestions on transmission line routes and substation

locations. Growth and increased power needs are occurring throughout Williamson County (See Section 1.2, Need). The additional MTEMC substation will relieve the burden on the other five substations that serve the county area. In light of these and other comments, MTEMC decided to change the location of its planned substation. This allows TVA to shorten substantially the proposed transmission line that is needed to serve the substation (see Figure 2-2).

125. *And the road will come next, and we have no say in it because we are outside of the city limits. The city alderpeople voted in the expansion, and we have no voice in that and they're going to put the lines in there and we completely disagree with it. I guess that's it. The city promoted growth which I didn't have a problem with, but when they promoted growth, that required power. So the power lines have come, and the supply route for the power was going to be through the city, but now the city has pushed it over into the county because the people in the county can't vote. The people in the city, just to appease the people that live there, they push it over on the people in the county, and it's not right. We have no vote, and they're going to put power lines in my neighborhood.* Commenter: Rory Rowan

**Response:** Comment noted. Careful consideration has been given to all of the comments from the public including suggestions and the reasons why certain routes or substation locations should be preferred over others, regardless of where commenters may live.

126. *Why disturb more of Williamson County's disappearing farmland than is necessary?*  
Commenter: Tom Zazzi

**Response:** The current preferred alternative involves very limited amounts of farmland and will not prevent it to continue in its present use. Agricultural uses typically continue on transmission line easements. TVA expects there would be little if any impact on such uses.

127. *Lower construction costs – Early research shows that the costs of Option A would be less....Option A has been defined as more environmental friendly....I have seen no logical reasoning why Option B is now the better solution! Why the change of plan?*  
Commenters: Lisa Dickinson, Rick Dickinson

**Response:** Option A would not have overall lower costs. The costs of either of the Route A options (parallel to the existing 500-kV transmission line or rebuilding the 500-kV line with the new 161-kV line underbuild on the 500-kV line) would be comparable or greater than the Option B routes. The underbuild plan for Option A would be especially expensive given the costs of the removal of the existing structures, the costs associated with the line outage, and the costs associated with spreading the work over several low-load seasons. Option A alternatives and Option B alternatives would all be significantly more expensive than the Mack Hatcher Alternatives based on the reduction in line length at minimum of 50 percent. For additional discussion of Alternative A, see Section 2.5.6., Identify Preferred Option.

128. *I believe that it is one of TVA's missions to provide power to a region with the least environmental impact to existing residents in the service area. Your adoption of Option B would not do that. Commenter: Andy Koepke*

**Response:** See Section 2.5, Project and Siting Alternative, for details of how TVA formulated and identified route options to minimize potential environmental impacts. During the project, TVA has evaluated the existing environmental conditions and potential impacts of constructing, operating, and maintaining the proposed transmission line along a number of different routes. The existing conditions are detailed in Chapter 3 and potential impacts, as well as measures to be taken to lessen these, have been described in Chapter 4.

129. *I am in favor of the Option Corridor A route for the following reasons: . . . 8) the increased cost to taxpayers . . . . Commenter: Garland C. Hunt, Sr.*

**Response:** TVA does not receive government-appropriated funds, so no tax money will be utilized for this project. TVA projects are funded by revenue from the sale of electricity and borrowings.

130. *There appears to be no definition for the area described as "Bingham" in your report, so when the statement is made that "the Bingham service area needs will be 62.1 MW above firm capacity in 2004," it begs the question: What does Bingham actually represent? For example, is it the Westhaven development and other new subdivisions in the Franklin City limits? It is an important distinction, since the substation and a large portion of the lines are in the county that does not have the large-scale developments. Commenter: Mary Brockman*

**Response:** Comment noted. The Final EA has been edited to clarify better the area in question. "The Bingham area" was a term used to describe the growing load area in the county immediately west of Highway 431 in the direction of the Bingham community.

131. *What is the time difference for completion between the best route which was identified as Option Corridor A and the preferred route B that TVA has chosen. Commenter: Mike Woodall*

**Response:** See section 2.5.3.1, Details of Option A, and 2.5.6, Identify Preferred Option. The exact completion time for Option A can only be estimated, but as currently proposed, it is expected to be substantially longer than that for Option B due to the outages that would be required on the existing transmission line.

132. *It seems like the biggest objection to using Plan A is that they're going to have to deal with the Park Services rather than the local governments and the residents of the area because of the Natchez Trace Parkway. Commenter: Elmer Cox*

**Response:** See Section 2.5.3.1, Details of Option A, and 2.5.6, Identify Preferred Option.

133. *I realize more power is needed for Franklin growth, but why should the county bear the burden of the power lines? Commenter: Ed Rainey*

**Response:** The load to be served by this project is located both within the city of Franklin as well as outside the city limits. The location process was designed to identify the best possible transmission line route regardless of which political jurisdictions were involved.

134. *It is SACE's belief that TVA can and should implement a public process and policy emphasizing the energy conservation aspects of electricity and the benefits to humanity. We believe that in Williamson County that the need for the power lines are in question if such policy were pursued in earnest. TVA has portrayed itself as a leader in the industry in wise use of electricity, and yet the GAO report – that's capital G-A-O, the government's I should say GAO report, says that TVA, that TVA's demand side management programs are generally limited in scope and contribute little to moderating future demand. This conflict is at the root of the public's distrust, and we believe that TVA and the public can and must harmonize clean – must harmonize the agenda for clean and efficient energy use. Commenter: John Noel*

**Response:** See Section 2.3.2, Load Reduction and/or Conservation.

135. *We have been told so many different things about actually where it was going to be taking place. Two year ago is completely different from what we heard tonight. I was disappointed that there wasn't a public forum on it. Commenter: Deborah Cox*

**Response:** Comment noted. TVA's proposal has changed as a result of comments received from the public and issues identified during the review process of the routes proposed, including efforts to avoid or reduce potential environmental impacts. This information was presented in the Draft EA and further explained in this Final EA. Questions and concerns also were addressed at the public meetings. The changes that occurred during the evolution of this proposal reflect TVA's sincere commitment to listening and responding to the public and to lessening potential environmental impacts. These are indicative of a good environmental review process.

136. *I'm disappointed that the public hearing is individuals coming back into a back room and commenting into a court reporter or to a court reporter. I think that diminishes the effectiveness of what a public hearing should be about, letting other concerned citizens hear each other in getting a collective thought or having a collective thought emerge. Secondly, I find it that the TVA personnel, while polite and fairly well-informed apparently, seem to be just giving lip service to this whole process as something that they have to do as opposed to providing a mechanism for constructively gathering input and having a public debate on the ultimate need and best path for this line. Commenter: Robert Bolen*

**Response:** See response to Comment 135. The public review process allows all interested parties to be heard equally. All questions and comments presented regarding the proposed transmission line have been taken into consideration.

137. *What we don't know in spite of repeated requests by the Harpeth River Watershed Association and the Southern Alliance for Clean Energy is how the TVA determined*

*the need for this line in the first place and how this proposed route was selected.*

Commenter: Robert Bolen

**Response:** See Chapters 1 and 2 of the Environmental Assessment.

138. *I highly encourage a full environmental impact statement be performed and information be given to those that can independently corroborate or refute the allegations made by the TVA regarding this proposed transmission line.* Commenter: Robert Bolen

**Response:** No additional information would be included in an Environmental Impact Statement (EIS) that is not already included in the Environmental Assessment (EA). The EA with its detailed analyses was made available to the public, governmental officials, and other agencies, providing an opportunity for independent corroboration of TVA's analyses. TVA representatives have also met numerous times with interested officials, landowners, and other groups to discuss the proposed action. TVA has completed a thorough review and has concluded that the proposed action would not significantly impact the environment. Therefore, it is TVA's position that an EIS is not warranted.